

The extraction of minerals from quarries is a core part of the daily activities carried out by the Breedon Group (**we/us**). We quarry minerals through a process called blasting under which we use explosives to break rock. Blasting creates both noise and vibrations which can be heard and felt at sites nearby or neighbouring the quarry. In keeping with our commitment as responsible quarry operators and as a good neighbour, we regularly seek to find ways to engage with our neighbours to keep them updated as to when a blast may be taking place (**Blasting Communications**).

Blasting Communications can take many forms and this privacy notice describes how we collect and use information as part of providing a Blasting Communication to the extent such information is personal data in accordance with the EU Regulation 2016/679 General Data Protection Regulation (**GDPR**). This document also satisfies our obligations under Article 30 of the GDPR. It applies to all occupiers of properties near to or neighbouring a site of the Breedon Group (**you/Neighbour**).

## 1. Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data, including any data you may provide to us when you sign up to our Blasting Communications.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The Company is a data controller for the purposes of the GDPR and every Neighbour receiving a Blasting Communication acknowledges the use and processing of personal data described in this privacy notice.

**Company** means the member of the Breedon Group whose quarry is located near you. **Breedon Group** means any of the companies within the Breedon group of companies, including, without limitation, Breedon Trading Limited, Breedon Cement Limited, Breedon Holdings Limited, Breedon Group Services Limited, Lagan Materials Limited, Lagan Asphalt Limited, Whitemountain Quarries Ltd, Alpha Resource Management Ltd, Breedon Cement Ireland Limited, Breedon Employee Services Ireland Limited and/or Breedon Brick Limited further details of which can be found at [www.breedongroup.com](http://www.breedongroup.com).

## 2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title and gender.
- **Contact Data** includes address, email address and telephone numbers including mobile telephone numbers.

Due to the Coronavirus pandemic, in addition to the collection of personal data as mentioned above, we may also be required to collect the following information from any third party when attending at one of our sites in order to comply with the Government's legislation/guidelines in respect of any track and trace system:

- information to determine whether a site visitor has experienced or are maybe experiencing Covid-19 symptoms (which may include temperature checks) or are in any of the high-risk categories which are most vulnerable to become infected and seriously ill (**Health Information**); and/or
- a positive result for Covid-19; details of anyone a site visitor may have been in contact with who has tested positive for Covid-19 or presented with symptoms; whether a site visitor has been asked to self-quarantine within the preceding 14 days; and/or where a site visitor has travelled to in the preceding 14 days (**Contact History**).

## 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email, via a Breedon website or otherwise.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Identity and Contact Data from data brokers or aggregators.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide the Blasting Communications to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we need to respond to your feedback.

See below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending a Blasting Communication via post, email or text message.

You have the right to withdraw consent to receiving specific Blasting Communications at any time by contacting us. We may continue to send generic Blasting Communications where permitted to do so under GDPR.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity   | Type of data                | Lawful basis for processing including basis of legitimate interest   |
|--|-----------------------------|--|
| To register you as a subscriber to Blasting Communications   | (a) Identity<br>(b) Contact | (a) To provide the Blasting Communications to you<br><br>(b) Necessary for our legitimate interests<br><br>(c) Necessary to comply with a regulatory or legal obligation |
| To manage our relationship with you which will include:<br><br>(a) Notifying you about changes to our terms or privacy policy<br><br>(b) Asking you to leave a review on the Blasting Communications or generally<br><br>(c) Responding to your feedback either to any of our Blasting Communications or generally | (a) Identity<br>(b) Contact | (a) Necessary to comply with a regulatory or legal obligation<br><br>(b) Necessary for our legitimate interests  |

|   |  |   |
|---|--|---|
| To collect your contact details in order to comply with Government legislation/guidelines or any track and trace system as part of a response to Covid-19 | (a) Identity<br>(b) Contact<br>(c) Health Information<br>(d) Contact History | (a) Public Interest: to ensure the health and safety of the public and our employees<br><br>(b) Necessary to comply with regulatory or legal obligation |
|---|--|---|

**5. Who we share Personal Data with**

We disclose personal data to a number of recipients which includes the following categories of persons:

- Other companies within the Breedon Group;
- Auditors and professional advisors, such as our bankers, lawyers and consultants;
- Law enforcement officials and statutory or regulatory authorities (including any involved in Covid-19 activities).

We may use and replace any third party which we wish to use to assist us in meeting its obligations under the contract, and where such third party is a processor of personal data, this constitutes prior general written authorisation as envisaged by Article 28(2) of the GDPR.

We may transfer personal data outside the EEA in accordance with the principles of the GDPR.

**6. Compliance with Data Protection Principles**

We will comply with data protection law which includes the GDPR (**Data Protection Laws**) applicable in the country in which the Company operates. This says that the personal information we hold must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that have been clearly explained and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

**Personal Data Retention Periods**

Except as otherwise permitted or required by applicable law or regulation, we only retain personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

**Technical and Organisational Security Measures**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**Duty to inform us of changes**

It is important that the personal information we hold about you as a Neighbour is accurate and current. We ask all such recipients of a Blasting Communication to keep us informed if personal information changes during your relationship with us.

**Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to personal information.
- **Request correction** of the personal information that we hold.
- **Request erasure** of personal information.

- **Object to processing** of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about the particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of personal information.
- **Request the transfer** of personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Breedon Group.

### Changes to this Record of Processing Activities

We reserve the right to amend this Privacy Notice from time to time consistent with the GDPR and other applicable data protection requirements.

### Make a complaint

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) or the Irish Data Commissioner's Office ([www.dataprotection.ie](http://www.dataprotection.ie)). We would, however, appreciate the chance to deal with your concerns before you approach them so please contact us in the first instance.

### Compliance Team

We have appointed a Compliance Team who are responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice please contact the Compliance Team using the details set out below.

### Contact details

| Name  | Office   | Telephone and e-mail   |
|---|--|--|
| <b>Ross McDonald</b><br>Group Services Director | Pinnacle House, Breedon<br>Quarry, Breedon on the Hill,<br>Derby, DE73 8AP | D: 01332 694404<br>M: 07717 336401<br><a href="mailto:ross.mcdonald@breedongroup.com">ross.mcdonald@breedongroup.com</a> |
| <b>Lorna Coxon</b><br>Company Solicitor         | Hope Works,<br>Hope Valley,<br>Derbyshire,<br>S33 6RP                      | D: 01433 622323<br>M: 07802 873723<br><a href="mailto:lorna.coxon@breedongroup.com">lorna.coxon@breedongroup.com</a>     |