

## BAM Nuttall Limited

# Personal Data Protection Policy incorporating the General Data Protection Regulation (GDPR)

The Board of BAM Nuttall is committed to ensuring any personal data that we collect and/or process is treated with respect and appropriately protected.

The aim is to ensure all personal data is used only as appropriate in a fair and ethical manner with a transparent approach to its use to ensure trust in the systems employed. We are committed to ensuring that BAM, all our employees and all third parties performing services for or on behalf of us only collect and process personal data necessary for legal and regulatory requirements and/or for legitimate organisational purposes.

The data we collect and process includes but is not limited to:

- Personal sensitive data (racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation and criminal convictions and offences)
- Personal data (e.g. home address, date of birth, passport number, etc)

The Board aims to ensure that everyone who works with personal data within BAM Nuttall understands the importance of protecting privacy.

The following Golden Privacy Rules will be applied by BAM to all personal data:

1. The processing is in compliance with [BAM Group policy](#) and data protection legislation.
2. The processing is for specific, determined, legitimate business purposes.
3. The access to and processing of data is limited to only that necessary.
4. The data is kept accurate, complete and up to date, is only kept as long as is necessary for the intended purpose and is then securely destroyed.
5. All personal data is treated as confidential and stored to prevent unlawful or unauthorised sharing, access or processing, accidental loss, destruction or damage.

6. Everyone has a duty to report any suspected data breaches.
7. The reasons for collecting and processing personal data are determined and are clearly communicated to the relevant individuals.
8. Appropriate data protection measures must be in place before any personal data is given to a third party e.g. data protection agreement.
9. The rights of individuals to access, correct, restrict and remove their personal data will be respected.
10. Address privacy risks before implementing new or revised business processes or services.

This policy is achieved by the Company by the effective implementation of our systems and processes.

The Board regards the responsibility of everyone in implementing this policy to be fundamental to BAM Nuttall meeting its stated commitments.

The Board has appointed the Privacy Officer to oversee the implementation of this policy and ensuring appropriate, robust management processes are in place and their effectiveness is reviewed.

This policy is reviewed for continuing suitability on a regular basis and revised as often as may be appropriate.



**Huw Jones**  
Executive Director, on behalf of the  
BAM Nuttall Board

