



Business Policy: Website Privacy

Reference	GRP/POL/025	Document Owner	Head of Legal	Issuing Date	02/06/25	Next Review Date	01/02/26
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1 Introduction

The website www.semperian.co.uk is operated by Semperian Group Limited ("Semperian Group", "we" or "us") and we are a "data controller" for the purposes of the Data Protection Act 2018 and the UK GDPR. This means that we are responsible for, and control the processing of, any personal data that you make available to us when visiting this website.

This privacy policy relates to your use of our website. Separate privacy notices apply where you are an employee of Semperian Group, a company director of one of our project companies, or if you are appointed as a contractor on one of our projects.

We take your privacy very seriously and we ask that you read this policy carefully, as it contains important information on:

- the personal information we collect about you;
- what we do with your information; and
- who your information might be shared with

2 Information which we may collect

We collect personal information about you when you provide us with your details or if you contact us via the website.

We may collect the following personal information:

- full name;
- email address;
- telephone number; and
- information about your enquiry (your message to us).

Please note that we do not collect any information in relation to your payment information, such as credit/debit card details, via our website.

3 How we use your information

We will collect your personal information for the following purposes:

- to identify you and manage your enquiry or message; and
- to customise our website and its content to your particular purposes.

Our legal basis for processing your personal information for these purposes is based on our legitimate interests to respond to enquiries about our services and to ensure our website is operating at an optimum level. We ensure that this does not risk your rights and freedoms.

4 How long we will keep your personal information

We shall retain your information for one year, unless we are required by law to retain your personal information for a longer period.



5 Our approach to information security

To protect your information, we have policies and procedures in place to make sure that: only authorized personnel can access the information; information is handled and stored in a secure and sensible manner; and all systems that can access the information have the necessary security measures in place. To accomplish this, all employees and contractors have roles and responsibilities defined in those policies and procedures.

To make sure all employees and contractors understand these responsibilities, they are provided with the necessary training and resources they need.

In addition to these operational measures, we also use a range of technologies and security systems to reinforce the policies.

To make sure that these measures are suitable, vulnerability tests are run regularly. Audits to identify areas of weakness and non-compliance are routinely scheduled. Additionally, all areas of the organisation are constantly monitored and measured to identify problems and issues before they arise.

6 Your rights

In order to process any of the requests listed below, we may need to verify your identity for your security. In such cases, your response will be necessary for you to exercise this right.

6.1 The right to access information we hold about you

At any point, you can contact us to request the information we hold about you, as well as why we have that information, who has access to the information and where we got the information. Once we have received your request we will respond within one month.

6.2 The right to correct and update the information we hold about you

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

6.3 The right to have your information erased

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

6.4 The right to object to processing of your data

You have the right to request that we stop processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

6.5 The right to ask us to stop contacting you with direct marketing

You have the right to request that we stop contacting you with direct marketing. In order to process your request, we may need to verify your identity for your security.

6.6 The right to data portability

You have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.

6.7 The right to complain to the ICO



You have the right to complain to the UK Information Commissioner's Office (ICO), about how we process your personal information. Complaints can be submitted to the ICO via their website at <https://ico.org.uk>.

6.8 Consent

In those cases where we need your consent to hold your information, we will ask you to check a box on any form requiring consent. By checking these boxes, you are stating that you have been informed as to why we are collecting the information, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject.

7 Sharing your information

Where necessary to fulfil our obligations to you, we may pass your details to third parties. These third parties include:

- Semperian Group – Your information may be shared with other entities in the Semperian Group if, for example, the query you have submitted applies specifically to a different entity in the Semperian Group.
- Gandi.net- host provider – All of your personal information will be stored in a secure central database in the “cloud” (on Gandi.net virtual servers) and transmitted securely across networks. This information will be accessible only to those who are authorised to view it.
- Google Analytics – We work with Google Analytics to automatically collect information including: IP address;; unique identifier or other persistent or non-persistent device identifier; device software platform, firmware and browser, mobile phone carrier and geo location data to help us understand your use of our website such as how often you return, what parts of the website you visit, how you use the website and how long you spend on the website. This third-party provider is prohibited from using our data for any other purposes. Go to <http://www.google.com/analytics/terms/us.html> to read Google Analytics Privacy Policy.

8 Cookies and tracking

8.1 Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. We use cookies on this website to:

- recognise you whenever you visit this website (this speeds up your access to the website as you do not have to log in each time);
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve our content; and
- make your online experience more efficient and enjoyable.

In most cases, we will need your consent in order to use cookies on this website. The exception is where the cookie is essential in order for us to provide you with a service you have requested.

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this website cookie policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.



8.2 How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the ICO's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>

9 Enquiries

When contacted with an enquiry, we will hold your name and contact details only for the purposes of handling the enquiry.

Our online forms are subject to the same cookies and tracking as the rest of the website (see the above section "Cookies and tracking" for more information).

Calls made to us may be recorded to protect the interests of all parties. Any calls recorded are deleted after 28 days unless needed for ongoing actions.

10 Contact details

If you have any queries about this policy, need further information or wish to lodge a complaint you can use the details below to contact the relevant party.

GDPR@semperian.co.uk

11 Changes to this privacy policy

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.