

## PRIVACY NOTICE

**Connect Roads (the “Company”, “we”, “our”, “us”)** facilitates (and the affiliated Concession Companies manage) the design, construction, financing, and operation of highway concessions under the UK PFI and PPP initiative.

Connect Roads (and the affiliated Concession Companies) is committed to protecting its clients' and third parties privacy and complying with the data protection laws.

This Privacy Notice sets out

- the information on how we collect and process personal data of clients and third parties with whom we deal (“you”)
- how Connect Roads will collect, use, and disclose your personal data, and
- your rights in respect of such personal data

when you send us letter or email or contact us by phone. We may update this Privacy Notice from time to time and will publish an up-to-date copy on the company website.

### Identity and Contact Details of Controller

Connect Roads is made up of different legal entities, details of which can be found on this website. When we mention "Connect Roads", we are referring to the relevant company within the Connect Roads business responsible for processing your data.

Connect Roads is a controller for the purposes of applicable law and responsible for your personal data.

We have also appointed a data privacy manager. If you have any questions about this privacy notice or our data protection practices, please contact:

Mark Mageean, Head of Operations - [connect@connectroads.com](mailto:connect@connectroads.com)

### The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data**, which may include first name, maiden name, last name, username or similar identifier, date of birth and gender.
- **Contact Data**, which includes email address and telephone numbers.

### How We Collect Your Personal Data

We will collect your personal data when you contact us by post, email, or telephone.

Some of the information Connect Roads holds may have been provided by third parties, such as insurers, local authorities, or operators engaged by us in connection with operation of highway concessions under the UK PFI and PPP initiative.

### **How Your Information May Be Used**

We will only use your personal information when the law allows us to, on one of the prescribed legal grounds. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation or requirement.
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Connect Roads may use your personal data for general business purposes, including, but not limited to, dealing with enquiries, compliments, and events in connection with our operation of highway concessions under the UK PFI and PPP initiative.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

### **How We Share Your Personal Data**

Connect Roads will only disclose information it holds to third parties to comply with law or regulatory requirements or where needed to comply with contractual duties, for instance passing on certain information to Companies House.

We do not transfer your personal data or information about third parties outside of the UK.

### **Data Security**

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

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

### **Data Retention**

Your personal data will be processed as long as it is necessary for the performance of the contract with you or for compliance with legal obligations, which Connect Roads is subject to.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### **Profiling and Automated Decision-making**

Connect Roads does not use automated decision-making processes and your personal data will not be used for profiling.

### **Your Data Rights**

Under the data protection law, you have several rights regarding your personal data, as follows:

- Right to request access to your personal data
- Right to request correction or rectification of your personal data
- Right to request erasure of your personal data or restriction of processing
- Right to object to processing; and
- Right to request the transfer of your personal information to another party.

If you have provided us a consent for the processing of your personal data, you have the right (in certain circumstances) to withdraw that consent at any time, which will not affect the lawfulness of the processing before the consent was withdrawn.

You also have the right to lodge a complaint to the Information Commissioner's Office if you believe that Connect Roads has not complied with the requirements of the data protection law or if you feel that your personal data is processed unlawfully or in breach of the data protection laws. However, we would like to hear from you in the first instance to try and resolve any of your concerns. If you have any questions or concerns, please reach out to our data privacy manager.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.