

## STEPHEN GEORGE + PARTNERS LLP

### PRIVACY POLICY

#### INTRODUCTION

Welcome to Stephen George + Partners LLP Privacy Policy.

Stephen George + Partners respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here

<https://www.stephengeorge.co.uk/wp-content/uploads/2024/03/Privacy-Policy-Website.pdf> . Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

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## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Stephen George + Partners collects and processes your personal data through your use of our website ([www.stephengeorge.co.uk](http://www.stephengeorge.co.uk)), including any data you may provide through our website when you sign up to our marketing communications or contact us with an enquiry. If you are a customer or supplier of Stephen George + Partners (or deal with us on behalf of a customer or supplier, e.g. if you are an employee of one of our customers or suppliers), this Privacy Policy will also inform you how we process your personal data pursuant to our relationship with you or the organisation that you represent.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements these other policies or notices and is not intended to override them.

### Controller

Stephen George + Partners (variously referred to as **SGP**, **we**, **us** or **our** in this Privacy Policy) is the controller and responsible for your personal data.

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise [your legal rights](#) please contact the DPO using the details set out below.

### Contact details

Our full details are:

Full name of legal entity: Stephen George + Partners.

We are registered in England and Wales under company number 11643395 and we have our registered office at Waterfront House 2a Smith Way, Enderby, Leicester, Leicestershire, United Kingdom, LE19 1SX.

**DPO:** Justine Chamberlain, Financial Partner

**Email address:** [gdpr@stephengeorge.co.uk](mailto:gdpr@stephengeorge.co.uk)

**Postal address:** Waterfront House 2a Smith Way, Enderby, Leicester, Leicestershire, United Kingdom, LE19 1SX

**Telephone number:** 0116 2470557

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

Data protection law requires SGP, as controller for your data:

- to process your data in a lawful, fair and transparent way;
- to only collect your data for explicit and legitimate purposes;
- to only collect data that is relevant, and limited to the purpose(s) we have told you about;
- to ensure that your data is accurate and up to date;
- to ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- to ensure that appropriate security measures are used to protect your data.

### **Changes to the Privacy Policy and your duty to inform us of changes**

We keep our Privacy Policy under regular review. This version was last updated on 11 June 2026 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the DPO of any changes in your data at the following email address: [gdpr@stephengeorge.co.uk](mailto:gdpr@stephengeorge.co.uk).

### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We and organisations connected with us have a social media presence for the purpose of engaging with you.

If you enable such connections or choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy policy of every website or forum that you visit or use.

## 2. 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, which we have grouped together as follows:

- **Identity Data:** first name, last name.
- **Contact Data:** postal address, email address and telephone numbers.
- **Financial Data:** bank account and payment card details.
- **Transaction Data:** details about payments to and from you and other details of services you have purchased from us.
- **Technical Data:** internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data:** information about how you use our website and services.
- **Marketing and Communications Data:** your preferences in receiving marketing from us and your communication preferences.
- **Project Data:** details of your requirements in relation to a project that you discuss with us or engage us on, and any feedback you give us in relation to the same.
- **Supplier Data:** details of the goods or services you offer and details of your qualifications and/or experience.

We refer to the above categories of data in the [‘Purposes for which we will use your personal data’ tables](#).

Where your relationship with us is on behalf of a business (for example, where you are an employee or representative of one of our customers, prospective customers or suppliers), it may be that the information you provide to us largely relates to the business that you represent, rather than you directly. Where this is the case, this Privacy Policy will apply only to the extent that we collect any information which relates to you personally (for example, we may collect your name and contact details to liaise with you where you deal with us on behalf of that business). If you have any queries as to which sections of this Privacy Policy are applicable to you, please [contact us](#).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (that is to say, details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **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, Contact, Financial, Marketing and Communications, Project and/or Supplier Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enquire about our services;
  - respond to our enquiry about your services;
  - subscribe to our blog/newsletter;
  - enter a competition;
  - give us some feedback or otherwise contact us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect **Technical Data** about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy <https://www.stephengeorge.co.uk/policies-cookie-policy/> for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google based outside the UK;

- Marketing and Communications Data from providers of electronic communications management services based outside the UK;
- Identity and Contact Data from providers of construction project related information based inside the UK;
- Identity and Contact Data from publicly available sources such as Companies House, Dun & Bradstreet and the Electoral Register based inside the UK.

#### 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 perform the contract we are about to enter into or have entered into with 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.

[Click here 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 third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

#### **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 tables below.

Our tables are split into separate categories, as follows: (1) Website users and mailing list subscribers; (2) Customers; and (3) Suppliers. Please review the table that is relevant to you, noting that you may fall under more than one category (for example if you are a customer that receives marketing communications from us, you should review tables (1) and (2)). Where your relationship with us is on behalf of a business or other organisation (for example where you are an employee of a customer or supplier of ours), you should review the table relevant to that business.

**(1) Website users and mailing list subscribers**

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or Privacy Policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Asking for feedback with regards to our services</p> <p>(d) Recording client relationship actions, including dates of meetings, telephone calls, event attendance etc.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p>	<p>(a) Necessary to comply with a legal obligation</p> <p>(b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</p>	<p>We use communications management services providers MailChimp and Deltek, based outside the UK, to record your communication preferences (including marketing opt-ins and out-outs)</p>
<p>To enable you to sign up to receive our blog/newsletter, partake in a</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Usage</p>	<p>Necessary for our legitimate interests (to offer marketing communications and business updates, to run and administer competitions as part of our marketing</p>	

**(1) Website users and mailing list subscribers**

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
competition or download a pdf report from our website	(d) Marketing and Communications	strategy and to prevent spam/multiple downloads of our content)	
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)	
To deliver relevant website content, advertisements and updates to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)	We use communications management services providers MailChimp and Deltek, based outside the UK, to record your communication preferences (including marketing opt-ins and out-outs)
To use data analytics to improve our website, services, marketing,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our	We use Google Analytics (based outside the UK) for this processing

**(1) Website users and mailing list subscribers**

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
customer relationships and experiences		marketing strategy)	activity.
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our services and grow our business)	

**(2) Customers (including prospective customers)**

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
To understand your requirements and register you as a new customer	(a) Identity (b) Contact (c) Project	(a) Necessary for our legitimate interests (to respond to your enquiry with a view to potentially providing services to you, or out of courtesy if we are unable to help)  (b) Performance of a contract with you	We use Deltek which is based outside the UK and Sage 50 based in the UK to process this data
To fulfil your instructions and perform any ancillary functions including to:	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you	We use Deltek which is based outside the UK and Sage 50 based in the UK

**(2) Customers (including prospective customers)**

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
<p>(a) Provide you with services</p> <p>(b) Manage payments, fees and charges</p> <p>(c) Collect and recover money owed to us</p>	<p>(d) Transaction</p> <p>(e) Marketing and Communications</p> <p>(f) Project</p>	<p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>	<p>to process this data</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or Privacy Policy</p> <p>(b) Asking you to provide feedback, leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p> <p>(d) Project</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</p>	<p>We use communications management services providers MailChimp and Deltek, based outside the UK, to record your communication preferences (including marketing opt-ins and out-outs)</p>

### (3) Suppliers

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
To liaise with you with a view to obtaining goods or services from you	(a) Identity (b) Contact (c) Supplier	Necessary for our legitimate interests (to identify appropriate suppliers for our business)	
To order goods or services from you and to pay you for such goods or services	(a) Identity (b) Contact (c) Supplier (d) Financial (e) Transaction	Performance of a contract with you	

## **Children's Data**

Our website is not intended for children and we do not knowingly collect data relating to children via our website. However, we do occasionally run competitions which are aimed at children. In connection with our competitions, we collect children's first names, ages and competition entries, usually from the parents or guardians of our entrants, via email or social media. We use this data for the purposes of administering our competitions and distributing prizes, and to share details of entries on our website. We only carry out this activity with consent (from the child directly if aged over 13 and in all other cases from the child's parents/guardians, where appropriate). If you are a child (or, where applicable, a parent or guardian of a child) who has previously consented to the processing of personal data in connection with a competition and you now wish to withdraw such consent, please [contact us](#).

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can manage your marketing preferences or opt out of marketing at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## **Promotional offers from us**

We may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion, or signed up to our blog or newsletter, and, in each case, you have not opted out of receiving that marketing.

## **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside of Stephen George + Partners for marketing purposes.

## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase you have made.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.stephengeorge.co.uk/policies-cookie-policy/>.

## **Change of purpose**

We will only use your personal data 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Third Parties as set out in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been officially deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **7. DATA SECURITY**

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.

## **8. DATA RETENTION**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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, regulatory, tax, accounting or other requirements.

We maintain an internal record of our retention periods for different aspects of your personal data in our Information Asset Register. If you have a query as to how long we retain your personal data for, please [contact us](#).

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

Please see the section below on [Your Legal Rights](#) to find out more. If you wish to exercise any of these rights, please [contact us](#).

### **No fee usually required**

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

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES

- Service providers acting as processors based outside the UK who provide analytics and electronic communications management services and IT software solutions.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, insurers, business development and marketing consultants based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.

### YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.