

## Data Protection Policy

Twelve Architects is committed to ensuring that it protects the rights and freedoms of all individuals with respect to the personal data it holds about them, whether in their personal or family life, or in a business or professional capacity.

This Policy applies to all who handle information and personal data held by Twelve Architects, including personal data. This Policy applies to all employees, sub-contractors, clients and industry colleagues.

This Policy will ensure:

- ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- compliance with the rights of data subjects in respect of receiving privacy information, and access, rectification, deletion and portability of personal data;
- any consent-based processing meets standards of active, informed consent, and that such consents are recorded and auditable;
- legal safeguards are in place to legitimise transfers of personal data outside the EU;
- the maintenance of records of personal data and the processing activities;
- we regularly test, assess and evaluate the effectiveness of the above measures as part of our ISO9001 Integrated BMS.

### Data Protection Officer

Twelve Architects DPO is Nina Kovacs

Technical measures ensuring the security of processing is clarified and set out in **Twelve Architects' Access Control Policy** (attached separately)


### Data Protection Principles

Twelve Architects will comply with the following Data Protection principles which stipulate that personal data be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject.
- collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.
- adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that data which is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
- kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed. Personal data may be stored for longer periods provided it is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. This is subject to the implementation of appropriate data security measures designed to safeguard the rights and freedoms of data subjects.
- processed in a manner that ensures its appropriate security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Twelve Architects will ensure that it is able to demonstrate compliance by:

- following best practice in all personal data processing;
- adhering to the relevant processing conditions for the fair and lawful processing of personal data;
- telling people why we are processing their personal data and who we will share their personal data with, through our clear and effective privacy notices;
- ensuring that if relying on consent from the data subject, it is freely given, specific, informed and unambiguous;
- implementing "privacy by default" measures to ensure that, by default, we only process the personal data necessary for each specific business purpose;
- ensuring all staff complete the mandatory Data Protection e-learning course as part of their induction and any subsequent refresher training;
- ensuring the Records of Processing Activities ("ROPA") is reviewed annually and kept up to date;
- ensuring a robust personal data breach detection, investigation and internal reporting procedure is in place;
- ensuring transfer of personal data outside of the EU is only carried out with a valid adequacy mechanism legitimising such a transfer;
- ensuring personal data is only kept for as long as necessary.

A handwritten signature in black ink, appearing to read 'M. Cartwright', with a horizontal line extending to the right from the end of the signature.

Matt Cartwright  
Director

Updated July 2020

GDPR email notification:

Twelve Architects Ltd is a controller of your personal data. Our contact details are:

Twelve Architects  
136-148 Tooley Street  
London  
SE12 TU

For queries related to this notice please contact: [ls.griffith@twelvearchitects.com](mailto:ls.griffith@twelvearchitects.com)

As a client of Twelve Architects we process your personal data. The data is limited to basic contact details such as name, email, job title and phone number.

Our legal basis for this processing is the fulfilment and management of our contract with you or your employer.

If we were unable to process this data, we might not be able to provide the same level of service.

We retain this data for up to 7 years after conclusion of our contract.

You have the qualified right to request: access to and port your data, rectification or erasure of the data, restriction of processing and to object to the processing.

You also have a right to lodge a complaint with a Supervisory Authority, for example the Information Commissioner's Office or [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)

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