# GROUND AND WATER LIMITED
# DATA PRIVACY POLICY

Welcome to Ground and Water Limited's data privacy policy.

Ground and Water Limited (**Ground and Water**, **we**, **us** or **our**) respects your privacy and is committed to protecting your personal data. This privacy policy explains how we look after your personal data when you visit our website (wherever you are visiting it from) or contact us by email or phone and share your data with us. It also explains your privacy rights and how the law protects you.

## 1. Important information and who we are

### Purpose of this privacy policy

This privacy policy explains how Ground and Water collects and uses your personal data when you use this website. This includes any data you give us through the website, such as when you complete a form or send us information, and any data you give us in person, by email or by phone. Please read this privacy policy so that you are fully aware of how and why we use your data.

We do not knowingly collect or use data relating to children. If you are a parent or guardian and you know that your child has given us personal data, please contact us using the details below. If we find that we have collected personal data from a child without verified parental consent, we will take steps to remove it from our servers.

We are the controller and are responsible for your personal data. If you have any questions about this policy or how we handle your personal data, or if you wish to exercise your legal rights under *Your legal rights*, please contact us using the details below:

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|---|---|
| Full name of legal entity: | Ground and Water Limited |
| Email address: | *enquiries@groundandwater.co.uk* |
| Postal address: | 2 The Long Barn, Norton Farm, Selborne Road, Alton, Hampshire GU34 3NB |

### Keeping your information up to date

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data changes during your relationship with us.

### Third-party links

This website may include links to third-party websites, plug-ins and applications. If you click on those links or enable those connections, third parties may be able to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about a person from which that person can be identified. It does not include data where the person can no longer be identified (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you. We have grouped these as follows:

- **Identity Data** includes first name and last name.
- **Contact Data** includes address, email address and phone number.
- **Financial Data** includes payment details such as bank account and payment card details (if applicable).
- **Technical Data** includes internet protocol (IP) address, 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 this website.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences for receiving marketing from us and our third parties, and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health, and genetic and biometric data. We also do not collect any information about criminal convictions and offences.

### If you do not provide personal data

Sometimes we need to collect personal data by law or under the terms of a contract we have with you. If you do not provide that data when we ask for it, we may not be able to perform the contract we have with you or are trying to enter into with you (for example, to provide you with services). If this happens, we may have to cancel a service you have with us, and we will tell you at the time.

## 3. How is your personal data collected?

We use different methods to collect data from and about you, including:

- **Direct interactions.** You may give us your Identity Data and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. We process this personal data for the purpose of:
    - providing and maintaining our services to you;
    - notifying you about changes to our services;
    - providing client support;
    - gathering information and analysis that helps us improve our services;
    - monitoring how our services are used;
    - detecting, preventing and addressing technical issues; and
    - providing you with news, special offers and general information about other services we offer that are similar to those you have already bought or enquired about, unless you have opted out of receiving this information.

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your devices, browsing actions and patterns. We collect this data using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies.
- **Third parties or publicly available sources.** We receive personal data about you from third parties and public sources, as set out below:

  Technical Data from the following parties:

  (a) analytics providers such as Google, based outside the UK;

  (b) advertising networks such as Google based outside the UK; and

  (c) search information providers such as Google, based outside the UK.

**Cookies**

We use cookies to tell you apart from other users of our website. This helps us give you a good experience when you browse our website and let us improve our site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. We use the following types of cookies on our website:

- **Strictly Necessary Cookies** – These are essential for providing the services available on the website and let you use some of its features. They help to confirm who users are and prevent fraudulent use of user accounts. Without these cookies, we cannot provide the services you have asked for.
- **Analytical or Performance Cookies** – These allow us to recognise and count visitors and see how they move around our website. This helps us improve how our website works, for example, by making sure users can easily find what they are looking for.
- **Other Cookies** – These are cookies that we are still classifying, together with the providers of those cookies.

You can manage your cookie preferences at any time using our cookie banner. You can accept all cookies, disable cookies where possible, or adjust your settings by category. You can also control cookies through your browser settings, including by blocking or deleting them. How you do this depends on your browser. Please note that disabling certain cookies may affect how the website works, and some features may not work as intended.

## 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we 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 it is necessary for our recognised legitimate interests (**RLIs**). These are different from legitimate interests. RLIs apply where there are public interest reasons for processing, such as preventing or detecting crime, safeguarding individuals, responding to emergencies, or supporting national or public bodies when they confirm it is necessary for their official functions. RLIs are recognised in data protection law. Where we rely on an RLI, we will make sure the use is strictly necessary and will only use or share the minimum data required.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. However, we will ask for your consent before sending third-party direct marketing communications to you by email or text message. You can withdraw your consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

The table below describes all the ways we plan to use your personal data and the legal basis we rely on for each. Where appropriate, we have also said what our legitimate interests are.

Note that we may process your personal data on more than one lawful ground, depending on the specific purpose for which we are using your data. If more than one ground is listed in the table below, please contact us if you need details of the specific ground we are relying on.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|---|---|
| To register you as a new client or supplier | (a) Identity<br>(b) Contact | Performance of a contract with you |
| To deliver our service and manage our relationship with you including:<br>(a) managing payments, fees and charges<br>(b) collecting and recovering payments owed to us<br>(c) notifying you about changes to our terms or privacy policy<br>(d) asking you to leave a review or take a survey | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Marketing and Communications | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to recover debts due to us and to keep our records updated and to study how clients use our services) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity<br>(b) Contact<br>(c) Technical | (a) Necessary for our legitimate interests and RLIs (for running our business, provision of administration and IT services, network security and to prevent fraud)<br>(b) Necessary to comply with a legal obligation |

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|---|---|---|
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity<br>(b) Contact<br>(c) Usage<br>(d) Marketing and Communications<br>(e) Technical | Necessary for our legitimate interests (to study how our services are utilised, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, services, marketing, client relationships and experiences | (a) Technical<br>(b) Usage | Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about services that may be of interest to you | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Marketing and Communications | Necessary for our legitimate interests (to develop our services and grow our business) |

**Marketing**

We aim to give you choices about how we use your personal data, particularly for marketing and advertising. You will receive marketing communications from us if you have requested information from us or bought services from us, and you have not opted out of receiving that marketing.

**Third-party marketing**

We will ask for your express opt-in consent before we share your personal data with any third party 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 in any marketing message, or by contacting us.

**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 that is compatible with the original purpose. If you would like an explanation of how 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 tell you and explain the legal basis that allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in line with the above rules, where the law requires or permits this.

## 5. Data transfer outside of the UK and EEA

Although we mainly operate within the UK, some of our external parties are based outside the UK and EEA, so using their services will involve transferring your personal data outside the UK and EEA. For example, we may transfer your personal data to service providers that carry out certain functions on our behalf. Your data may also be processed by staff outside the UK and EEA who work for us or for one of our suppliers. If your personal data is transferred to, stored in or otherwise processed in a country or territory outside the UK and EEA that has not been recognised as providing an adequate level of data protection, we will put additional safeguards in place to protect it. These are based on specific contracts approved for use in the UK and EEA, which give personal data the same protection it has in the UK and EEA. Please contact us if you would like more information about the specific mechanism we use when transferring your personal data out of the UK and EEA.

## 6. Disclosures of your personal data

We may share your personal data with third parties for the purposes set out in the table *Purposes for which we will use your personal data* above. We require all third parties to respect the security of your personal data and to treat it in line with the law. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

The third parties we may share your personal data with include:

- Service providers who act as our processors and provide IT and system administration services, such as Microsoft 365;
- Professional advisers, including lawyers, bankers, auditors and insurers, who provide consultancy, banking, legal, insurance and accounting services; and
- HM Revenue & Customs, regulators and other authorities in the UK who require us to report on our processing activities in certain circumstances.

## 7. Data security

Unfortunately, sending information over the internet is never completely secure. Although we will take reasonable steps to protect your personal data, we cannot guarantee the security of data you send to our site, so any transmission is at your own risk.

We have put appropriate security measures in place to prevent your personal data from being accidentally lost, used, accessed without authorisation, altered or disclosed. We also limit access to your personal data to 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 ask our third-party contractors and site service providers to follow similar standards of security and confidentiality.

We have procedures in place to deal with any suspected personal data breach. We will tell you and any applicable regulator about a breach where we are legally required to do so.

## 8. Data retention

### How long will we keep your personal data?

We will only keep your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including to satisfy any legal, regulatory, tax, accounting or reporting requirements. We may keep your personal data for longer if there is a complaint or if we reasonably believe there is a prospect of litigation relating to our relationship with you.

To decide how long to keep personal data, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it and whether we can achieve those purposes by other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data. See *your legal rights* below for more information.

In some circumstances we will anonymise your personal data (so that it can no longer be linked to you) for research or statistical purposes. We may use this anonymised information indefinitely without further notice to you.

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of your 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 ask you for specific information to help us confirm your identity and your right to access your personal data (or to exercise any of your other rights). This is a security measure to make sure personal data is not disclosed to anyone who has no right to receive it. We may also contact you for further information about 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 longer than a month if your request is particularly complex or you have made a number of requests. In that case, we will tell you and keep you updated.

## 9. Use of Artificial Intelligence (AI) Tools

We may use artificial intelligence (AI) tools to process personal data. We use these tools to improve our products by analysing data patterns, to improve customer experience and to keep our systems secure. The purposes for which we use AI tools include, but are not limited to:

- Data Analysis and Insights: AI tools analyse data to give us insights that help us improve our products and tailor them to customer needs.
- Security and Fraud Prevention: AI tools will be used to detect and prevent fraud, helping to protect the safety and integrity of our systems.
- Personalisation: AI tools help us personalise customer experiences by recommending content or products based on customer preferences and behaviour.

We are committed to making sure our use of AI tools complies with all applicable data protection laws, including the UK General Data Protection Regulation, the Data Protection Act 2018, the Data (Use and Access) Act 2025 and other relevant legislation. We use appropriate technical and organisational measures to protect personal data and uphold individuals' rights.

## 10. Glossary

**Consent** means that you have freely given a specific, informed and unambiguous indication of your wishes, through a written statement or clear positive action, including (among other things) agreeing to be contacted by our marketing teams or to take part in a market research project for which information is collected on our behalf by us or our third-party recruiters.

**Legitimate Interest** means the interest of our business in running and managing our business so that we can give you the best service and the best and most secure experience. Before we process your personal data for our legitimate interests, we consider and balance any potential impact on you (both positive and negative) and your rights. 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 by law. You can contact us for more information about how we assess our legitimate interests against any potential impact on you for specific activities.

**Recognised Legitimate Interest** means a specified purpose for handling personal data that is in the public interest. It covers situations such as crime prevention, public security, national security or defence, safeguarding, emergencies, or sharing personal information to help other organisations carry out their public tasks or official functions. We are not required to assess whether a person's rights, freedoms or interests outweigh a recognised legitimate interest, but we must consider whether what we want to do is necessary.

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

**Comply with a legal obligation** means processing your personal data where it is necessary for us to comply with a legal obligation that applies to us.

## 11. Your legal rights

In certain circumstances, data protection law gives you rights in relation to your personal data.

**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, although we may need to check the accuracy of the new data you give 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 to continue processing 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 for erasure for specific legal reasons. If so, we will tell you about those reasons 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 something about your particular situation makes you want to object to processing on this ground because you feel it affects 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 be able to show 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 situations:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer need it, because you need it to establish, exercise or defend legal claims.
- Where you have objected to our use of your data, but we need to check 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 give 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 originally gave us consent 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 tell you if this is the case when you withdraw your consent.

## 12. Data Protection Complaints

We are committed to protecting your personal data and take all complaints about how we handle it seriously. This section explains how we deal with complaints.

You have the right to complain to us if you are dissatisfied with the way we handle your personal data. This includes, but is not limited to, insecure handling of your personal data, failing to meet your data protection rights (such as subject access requests), or unfair or unlawful processing of your personal data. You can make a complaint by emailing us at *enquiries@groundandwater.co.uk* or writing to us at 2 The Long Barn, Norton Farm, Selborne Road, Alton, Hampshire GU34 3NB.

When you make a complaint, please include your full name, contact details and full details of the complaint. We will acknowledge receipt of your complaint within 30 days and will investigate it. We will give you a substantive response without undue delay.

To help us improve our services, we will keep records of all data protection complaints, including the nature of each complaint and the action we took.

We are registered with the Information Commission's Office (**ICO**), the UK's supervisory authority, with registration number ZA099472. If you are not satisfied with our response, you have the right to complain directly to the ICO at Information Commission's Office, 4th Floor, No.3 Circle Square, 5 Hawkshaw Street, Manchester M1 7BL.

## 13. Changes to the privacy policy

We keep our privacy policy under regular review. This version was last updated on 17 November 2026.