

## Introduction

This policy applies to Balfour Beatty's UK business. Balfour Beatty is committed to ensuring compliance with the requirements of data protection law. This means recognising the balance between keeping information confidential and secure and the need to be able to use and share it where necessary. The aim of this policy is to present a summary of Balfour Beatty's approach to achieve this.

## Objective

Our objective is to ensure people are treated fairly and lawfully and that we protect them from harms that can arise from their personal data being misused. The rights of individuals, including the right to privacy and the protection of personal data, matter to us and we aim to make all our staff aware of their responsibilities under the law.

## Arrangements in place

Balfour Beatty's Data Protection Officer (DPO) is responsible for informing and advising the business and its staff on its data protection obligations, and for monitoring compliance with those obligations and associated procedures held on the Business Management System (BMS).

## Who is responsible?

All persons carrying out any function or work directly for or on behalf of Balfour Beatty are accountable for protecting the personal data that they process. If you have access to personal data, you must:

- only access the personal data that you have authority to access, and only for authorised purposes;
- keep personal data secure by complying with rules on password protection and secure file storage;
- not remove personal data from the business's premises unless appropriate security measures are in place; and

- report all identified and suspected personal data incidents or breaches without undue delay.

Balfour Beatty defines its approach to handling personal data in line with several key principles. These include ensuring that there is a valid lawful basis for processing personal data, being transparent in communicating to individuals about how their information will be used and collecting only the minimum necessary personal data to fulfil a specific purpose. Balfour Beatty also commits to being responsible for the integrity and confidentiality of personal data and will seek to actively demonstrate this commitment.

## Discharging the policy

Balfour Beatty will promote responsible handling of personal data through education and training. This includes making individuals aware of how to report a data incident and how to respond to a data subject rights request. We will take action against significant noncompliance, particularly if poor data handling results in the business not being able to meet its legal or ethical obligations.

We understand the value data has to individuals, its benefits to the business and its place in society. By treating every person we encounter with dignity and respect, we can ensure that our employees, subcontractors and other relevant data subjects have greater confidence that we are operating with their best interests in mind.

We will bring this policy to the attention of our employees, supply chain partners and relevant interested parties; and review it on a regular basis.

## AUTHORISATION

**Tracey Wood**

**General Counsel & Company Secretary**

**January 2025**