CCG (SCOTLAND) LIMITED & ITS GROUP OF COMPANIES PRIVACY AND FAIR PROCESSING NOTICE

2026

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CCG (Scotland) Limited, along with its group companies CCG (Holdings) Limited, CCG (OSM) Limited, CCG Manufacturing Limited, Hampton & Steel Limited, CCG Homes Limited, Arc-Tech (Scotland) Limited, Arc-Tech MU Limited, D Campbell & Company Limited), and CCG Lettings Limited, (together "CCG") strives to protect the privacy of all personally identifiable information collected during the course of our business and it is important for you to know how we process your data. We will process your personal information under the terms of this policy and in accordance with any agreement with you.

We are a "data controller" in terms under data protection law (including from 25 May 2018, the EU General Data Protection Regulation 2016 and the Data Protection Act 2018) ("Data Protection Laws").

We need to process personal data relating to our suppliers, customers and potential customers in order to function effectively as a business, ensure good governance, for audit purposes to perform our business and to enable us to meet our legal obligations.

Personal data is processed for commercial, administrative, statutory and marketing/promotional purposes. All such personal data is collected and held in accordance with all applicable Data Protection Laws.

WHAT PERSONAL INFORMATION WILL CCG USE?

This list includes all the ways we may use your personal information, and which of the reasons we rely on to do so. This is where we tell you what our legitimate interests are.

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Personal Information We May Process -	Our Reason for Processing	Legitimate Interests
<u>Suppliers & Business Contacts</u> ➢ Work address and contact details	Our legitimate interests	➢ To keep in contact with suppliers ➢ Administering our business and contracts
<u>Customers</u> ➢ Client tenant's name, address, telephone and email ➢ New homeowner's name, address, telephone and email ➢ Customer's contact – employee name, telephone and email	➢ Fulfilling contracts ➢ Our legitimate interests	➢ To keep our customer and recent customer contact list up-to-date with our current business activities (always in accordance with the laws on marketing).
<u>Potential Customers & Website User for Specific New Build Developments</u> ➢ Name ➢ Email ➢ Telephone number	➢ Fulfilling contracts ➢ Consent ➢ Our legitimate interests	➢ To keep contact list up to date with our current business activities (always in accordance with the laws on marketing)
<u>Marketing for Specific New Build Developments</u> ➢ Enquiry into home ownership ➢ Name ➢ Address ➢ Telephone ➢ Email	➢ Consent ➢ Contract	➢ Administering our business ➢ To keep our contact list up to date with new build developments (always in accordance with the laws on marketing)

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WHERE DO WE OBTAIN YOUR INFORMATION?

In most cases we will obtain this information from you directly.

PROCESSING CONDITIONS

We process the personal data referred to above for the purposes of any contract or potential contract with our suppliers, customers and potential customers; or for our legitimate interests in order to function effectively as an organisation, to ensure good governance, for audit purposes, to train our staff, to perform our business activities; and to enable us to meet our legal obligations that we may be subject to as an employer. We also maintain marketing lists to inform people about our business activities and new build developments. We do this either on the basis of opt-in consent or our legitimate interests (for existing customers) always in compliance with the laws on marketing. You can unsubscribe at any time from such lists.

WHO DO WE SHARE YOUR INFORMATION WITH?

The information you provide to us may be accessed by our staff, sub-contractors, auditors, our professional advisors and carefully selected third parties in the course of providing services to us (such as providers of computer software solutions or IT services) under suitable obligations of confidentiality.

We may also use information in aggregate, where personally identifiable information is removed, for marketing and strategic development to improve and support our activities.

SECURITY

We employ administrative, electronic and physical security measures to ensure that the information that we collect about you is protected from access by unauthorised persons and protected against unlawful processing, accidental loss, destruction and damage.

Please be aware that unfortunately the transmission of information via the internet or by email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of the data transmitted to us and any transmission is at your own risk.

THE PERIOD FOR WHICH THE PERSONAL DATA WILL BE PROCESSED

We will retain personal data securely and only in line with how long it is necessary to keep for the purposes or for a legitimate and lawful reason. Our typical retention periods are as follows:

Tenants and new home owner information	For as long as they remain a homeowner or tenant of a property that CCG have worked in and for 6-10 years, relating to tenancy or building warranty periods.
Potential customers who missed out on buying or renting a CCG property	Following the selling out of a private housing development, all customer information is deleted
Supplier and business contacts and documentation	Will be held for the duration of the relationship

Some personal data may be retained for longer where it is in our legitimate interest to do so, such as to protect and defend our legal rights; or for research, archiving or statistical purposes. Individuals can request that other information relating to them be erased and we will deal with such requests in accordance with the law.

TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

We, or carefully selected third parties that we contract with, may send personal data to countries outside the European Economic Area ('EEA'. If and when this occurs, there will be protections in place to ensure the recipient protects the data to the same standard as the EEA. The protections include:

- Transferring to a non-EEA country with privacy laws that give the same protection as the EEA.
- Putting in place a contract with the recipient that means they must protect personal data to the same standards as the EEA.
- Transfer personal data to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for personal data sent between the US and EU countries which makes sure standards are similar to what is used within the EEA.

YOUR RIGHTS IN CONNECTION WITH YOUR PERSONAL INFORMATION

Under certain circumstances, by law you have the right to:

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

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Privacy Manager in writing.

NO FEE USUALLY REQUIRED

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.

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 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.

RIGHT TO WITHDRAW CONSENT

In any circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Privacy Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

For more information and guidance about any of these rights please go to the website of the Information Commissioner's Office at https://ico.org.uk/.

COMPLAINTS

If you think there is an issue in the way in which we handle your personal data, you have a right to raise a complaint with the Information Commissioner's Office. Their website contains details of how to make a complaint. However, we request that you give us the opportunity to deal with your complaint in the first instance.

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CHANGES TO THIS PRIVACY NOTICE

We keep our Privacy & Fair Processing Notice under regular review and reserve the right to update and amend it. This notice was last updated in April 2026.

FURTHER INFORMATION

For further information regarding CCG and our Privacy and Fair Processing Notice please contact:

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