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1. Scope

This policy reflects JGC Corporation (UK) Limited (Hereinafter referred to as “JGC-UK”) commitment to the requirements of Articles 13 and 14 of the GDPR in relation to the provision of information by a controller to data subjects which is central to the processing of personal data in a fair and transparent manner (as required by Article 5(1)(a)).

The policy is intended for the visitors and users of the JGC-UK’s official website (WWW.JGC-UK.COM).

2. Who we are

This website is operated by JGC Corporation (UK) Limited. JGC Corporation (UK) Limited is made up of a single business entity, details of which can be found below.

JGC Corporation (UK) Limited is a private limited company registered in England and Wales under number 01532803.

We are registered as a controller with the Information Commissioner’s Office under number ZA358457 in relation to the processing of personal data, which means that we are responsible for deciding how we hold and use data and information about you.

3. About this policy

This policy explains how we collect and use personal data from and about visitors to our website (WWW.JGC-UK.COM) through: Browsing our website (via the use of Cookies), and/or contacting us through the online contact form found at: <http://www.jgc-uk.com/contact-us>.

This policy has been prepared in accordance with the draft Guidelines on Transparency under Regulation 2016/679 (WP260) published by the Article 29 Working Party. This policy was last updated on 21 May 2018.

This policy is issued on behalf of this business entity only and when we refer to we and us, we are referring only to this business entity that is responsible for handling your personal data collated via our online contact form. JGC Corporation (UK) Limited is identified as the relevant business entity that is the controller in respect of the personal data being input via the online contact form. This policy does not apply to the websites of any other JGC Group organisations located outside the EEA that you may access via the link on our website to our ‘Our Global Network’ and that you may access through browsing further links or how any other JGC Group organisations which advertise services on their websites accessed via our website via our ‘Our Global Network’, nor does it apply to how they may collect and use your personal data. This policy therefore does not apply to the websites of any other JGC Group organisations located outside the EEA, including the website of the parent company, JGC Corporation, the websites of the ‘Domestic Affiliated Companies’ based in Japan and the websites of the ‘Overseas Affiliated Companies’ based outside of the EEA. Our objective is to ensure that you are never surprised by how your personal data has been used by us. This policy represents our obligation to inform data subjects about the processing of their personal data and their rights.



4. The data we collect about you

Personal data means any data that identifies or can be used to identify a person. It does not include data where the identity has been removed (anonymous data).

The data that we may collect about you may be obtained in the following ways:

(1) You may provide the following kinds of data to JGC-UK via the online “contact-us” form:

- (a) Your name and contact details.
- (b) The contact details of another person when you have contacted us on their behalf.
- (c) The content of any messages you submit.
- (d) The IP address assigned to the device you are using to access the website.

(2) Through the use of cookies and similar technologies (such as beacons and pixels) and server logs, or by third party analytics providers such as “Google”:

- (a) The IP address assigned to the device you are using to access our website.
- (b) The unique identifier of the device used by you to visit our website.
- (c) technical data about the device used by you to visit our website including the type of device, operating software, browser and browser plug-ins and the screen resolution and time zone setting of your device.
- (d) Data about how you browsed and searched our website including how you arrived at our website, the time and frequency of your visits, the time spent by you on each page, how you interacted with the website, the links that you click, documents you download and content that you view.
- (e) Your location (if you grant us access to it, though the IP address assigned to you or to someone who provides you with Internet access may indicate the country from which you have visited our website).

We may also collect and use data that is derived from your personal data but which does not directly or indirectly reveal your identity. This data may be combined with data collected about other visitors to our website to calculate the percentage of visitors that view a particular page or the most popular time of day when our website is viewed, for example. This is not considered personal data under the law unless we combine it with other data that can be used to directly or indirectly identify you.

5. How we use your data

We will only use your personal data when the law allows us to. We will generally rely on one of two legal grounds for using your personal data:

- Where necessary for our legitimate interests or those of a third party, provided those interests do not override your fundamental rights and interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for using your personal data, since



we do not send you any marketing by email or by text message as a result of your making contact with us via our online contact form. You have the right to withdraw your consent to receiving email contact from us at any time by contacting us.

Specifically, we will use your personal data as follows:

Purpose(s)	Type(s) of data	Legal ground(s) for use
Store your contact details and message for a short period of time, namely until a response is sent (and only when a response is required)	Contact details	legitimate interests
Contacting you by email or telephone in line with your contact preference	Contact details	legitimate interests

6. Who we share your data with

We do not sell any personal data for commercial purposes, we do not transfer your data outside of the (European Economic Area) with the single exception of JGC Corporation in Japan. The details of any transfer (as well as the personal data covered) to the parent company, JGC Corporation is performed with appropriate safeguarding in place, as specified in Annex B of the standard contractual clauses for the transfer of personal data from the Community to third countries (controller-to-controller transfers) Data Transfer Agreement. Annex B forms an integral part of the controller-to-controller standard contractual clauses.

We may have to share your personal data with:

- UK based providers of IT and system administration services
- UK based providers, namely our domain hosting provider, website analytics provider
- Any third parties to whom we may choose to sell, transfer or merge parts of our business or assets or third parties we may seek to acquire or merge with (if any change happens to our business, the new owners may use your personal data collated via our online contact form in the same way as set out in this policy).

7. Where your data is stored

The service providers that we use in connection with our website and the services provided through it are based within the EEA, which means that your personal data is not transferred outside the EEA, with the sole exception of above defined appropriate safeguarded transfer to JGC Corporation.



8. How we keep your data secure

The security of your personal data is important to us.

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. We also limit access to your personal data to those within our organisation that have a legitimate need to access it. They will only process your personal data on our instructions and they are required to keep your personal data confidential.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office or any other relevant regulator where we are legally required to do so.

9. How long we keep your data for

We will only keep your personal data for as long as necessary in connection with the purposes we collected it for and to comply with any legal, accounting or reporting requirements. To determine how long we keep your personal data for, we consider the amount, nature and sensitivity of the personal data, the purposes for which it was collected and the potential risk of harm from us continuing to keep it.

We will retain personal data relating to your email address data until you withdraw your consent to receiving email contact from us or your email address has become permanently unavailable, whichever is the sooner.

The analytical data collected about your use of our website may be retained for a maximum period of 26 months on and after 25 May 2018.

We may retain any data that does not identify you indefinitely.

10. Cookies

This website uses cookies and similar technologies (such as HTTP Cookies, beacons, and pixels).

Cookies are small text files that are stored on your device and contain a uniquely generated reference which is used to distinguish you from other people each time you visit our website, even if the IP address of the device used by you to visit our website changes. None of the cookies used on our website store data that can directly identify you.

- **Necessary cookies:** Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- **Statistical (Analytical) cookies:** Statistical cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing cookies:** Marketing cookies are used to track visitors across websites. The



intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

The specific cookies used by our website are listed in the “Cookies Declaration” page of the website, under the “Privacy” page.

11. Accepting and withdrawing consent for cookies

We are required to obtain your consent to all cookies except those that are strictly necessary.

When visiting our website for the first time, a cookies consent banner will appear on our website. You will have the choice to read details about the cookies and choose types of cookies to accept or deny.

Alternatively, you can visit the “Cookies Declaration” page of our website, under the “Privacy” page, at any time to find information about your current consent status, change your choices of cookies for which you have provided consent, or withdraw your consent.

There are other ways of removing cookies from your devices and such methods can be found via an internet search. Most internet search engines or browsers provide web based tutorials on removing cookies from devices.

12. Your rights

You have a number of rights in relation to the personal data we hold about you. As per <https://ico.org.uk/for-the-public/>, you have the rights of: access, correction, deletion, restriction, objection, portability and complaints.

You will not have to pay any fee to exercise any of the above rights, though we may charge a reasonable fee or refuse to comply with your request, if any request is clearly unfounded or excessive. Where this is the case, we will let you know via your preferred mode of contact.

To protect the confidentiality of your personal data we will ask you to verify your identity before fulfilling any request in relation to your personal data.

For further details about your rights, refer to the website of the Information Commissioner’s Office (ICO) or other EU supervisory authority.