

# SNC-Lavalin Privacy Notice

## Introduction

This Privacy Notice applies to all Personal Data that SNC-Lavalin and other subsidiary or affiliated companies of SNC-Lavalin (referred to throughout as “SNC-Lavalin”) and any websites or equivalent internet resources may generally collect, process and store about you.

By providing your Personal Data to SNC-Lavalin, you expressly acknowledge that you have read and understood this Privacy Notice.

This Privacy Notice is published on all SNC-Lavalin websites to ensure it is readily available to all individuals at any point. SNC-Lavalin reserves the right to amend the Privacy notice from time to time where reasonable to ensure it continues to accurately reflect the way in which we process Personal Data. Any updates or changes to the Privacy Notice will be published on the SNC-Lavalin intranet and highlighted at the end of this document.

The privacy and security of the Personal Data collected from you is a priority to SNC-Lavalin. It is also important to us that you understand how we handle this data.

## SNC-Lavalin’s Data Privacy Principles

**Data Privacy is built into everything we do.** Our data privacy principles apply to everything we do, no matter where we do it. To this end:

1. SNC-Lavalin **takes responsibility** for the Personal Data we hold and process.
2. Personal Data is **collected and processed fairly, lawfully, transparently** and in accordance with our Code of Conduct and Data Privacy Compliance Policy Framework.
3. Processing of Personal Data is **always documented and assessed** at the outset to ensure there is the minimum privacy risk and impact to individuals.
4. Personal Data of individuals is **always protected, secure and kept confidential**.
5. Personal Data is **collected only where necessary** for legal, regulatory and business purposes and only used for the purposes it was collected for.
6. Personal Data is **only retained for as long as is necessary** to achieve the original processing purpose or to satisfy our legal and regulatory obligations.

This policy sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be processed by us.

For the purposes of any Data Protection legislation, the Data Controller is SNC-Lavalin.

## What is the Basis for Processing this Personal Data?

Our processing of Personal Data is aimed purely to allow us to respond to your requests (such as for us to contact you, or to send you information) and is based on the following legal grounds:

Legal Basis	Example
<b>Performance of a contract</b>	Where we enter into a contract for the provision of products or services, we may need to collect and process your personal data so that we can meet our contractual obligations. This also applies to any pre- contract activity, such as providing a quote or details regarding the products or services that you have expressed an interest in
<b>Regulatory and legal obligations</b>	We may collect and process Personal Data to comply with our regulatory or legal obligations. For example, where we are legally obliged to keep records of sales and any associated tax records.
<b>Legitimate commercial interests</b>	We may process Personal Data where such processing is necessary to pursue our legitimate commercial interests, such as operating our business and defending legal claims.
<b>Consent</b>	Where we rely specifically on consent to collect and process non-mandatory Personal Data, you are not obliged to provide your consent for the use of your Personal Data and you may

Legal Basis	Example
	subsequently withdraw your consent once it has been provided. It should be noted however that this may limit your experience with our resources and services.

## What are my Data Privacy rights?

Every individual has the following rights in relation to the processing of their Personal Data by SNC-Lavalin:

- The right to access and inspect their Personal Data or be provided with a permanent copy of the information being held about them.
- The right to request the correction of any inaccuracies in their Personal Data or where the accuracy of information is disputed, to add additional information to give notice that they dispute the accuracy of the information content.
- The right to request the erasure of their Personal Data, particularly where the continued processing of the information is no longer necessary.
- The right to object to the processing of their Personal Data, particularly where there are no longer sufficient legitimate grounds for SNC-Lavalin to continue processing the information.
- The right to restrict processing, data portability and the right to appeal any automated decision making or profiling.
- The right to complain to a Data Protection Regulator about SNC-Lavalin's processing of Personal Data.

It is important to note that the rights set out above are not unconditional and the specific circumstances of the processing being undertaken by SNC-Lavalin will determine if these rights may be exercised. Further information concerning these rights and their application can be obtained from the Data Protection Officer.

## Information we may collect from you, and use we may make of it

We will hold and process any personal information which you provide via the site or by submitting emails and/or online forms, for our own internal business purposes, including lawful purposes relating to recruitment where information is sent by you via the recruitment part of the site. For details of the Recruitment Notice, please see [here](#)

Examples of Personal Data we may collect from you include, but is not limited to:

- First Name and Surname
- Contact telephone number(s)
- Contact email address
- Home or Office Address
- Job Title
- Your Organisation details
- Professional Qualifications

In addition to the information you submit to us via the site, we may collect information about visits to the site. We collect information on the page browser access. This is used within SNC-Lavalin to improve the design and layout of our sites. We gather information on the relative popularity of each page, the average number of pages accessed by visitors, the number of emails sent or files downloaded, and the average time spent on the site. None of this information is linked back to you as an individual. For details of how we use Cookies and any Website Analytics, please click see the Cookie section below.

## Where we store your Personal Data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## How is your Personal Data kept secure?

SNC-Lavalin have implemented appropriate security measures to protect the confidentiality, integrity and availability of Personal Data. We employ organisational and technical security measures, including password protection, encryption, physical locks, etc., to protect Personal Data and to ensure it is processed appropriately, consistently and in accordance with applicable data privacy laws and regulations. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

If you are authorized to have access to the Personal Data of others, it is important that you take appropriate safeguards to protect this Personal Data.

SNC-Lavalin monitors Internet traffic to detect access to inappropriate websites or other materials. SNC-Lavalin also uses email filters to block spam and computer viruses. It is possible that some legitimate email messages and websites may be blocked or hindered by these filters.

## Disclosure of your information

We do not pass on or sell online personal information to third parties. We may however share information within our organisation and in some cases, it will be necessary to pass information to our pension or share administrators. This may include our employees, agents, contractors and sub-contractors. Please note that by sending your personal information to us you are consenting to the processing and transfer of such information in this way.

## How long is your Personal Data retained for?

We retain appropriate records of Personal Data for Regulatory, Legal and Contract administration purposes. We only keep Personal Data for as long as necessary for the purpose or purposes it was collected for. Records are retained for a predefined retention period that may extend beyond a contract with SNC-Lavalin. Personal Data is retained to comply with other legal and contractual obligations and requirements such as Health and Safety. Where required, further information concerning our records retention policy can be obtained from the SNC-Lavalin Data Protection Officer whose contact details are below.

## International transfers of Personal Data

We may transfer Personal Data, for the processing purposes outlined in this Privacy Notice, to any other companies within SNC-Lavalin or to Third Parties who process data on our behalf under our instruction. SNC-Lavalin and relevant Data Processors may operate globally across Europe, the Middle East, Asia Pacific, North America and Africa and may also set up establishments in other regions. We therefore reserve the right to transfer and process Personal Data on a global and worldwide basis in line with our legal, regulatory and contractual obligations.

We will only transfer Personal Data where necessary to operate our business, meet our contractual obligations and comply with our legal and regulatory obligations. We will endeavour to ensure that such transfers of Personal Data comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred on all individuals under such laws. There may, however, be instances where for legal or contractual reasons, we are not permitted to transfer Personal Data outside of certain jurisdictions. Where required, further information concerning overseas transfers of Personal Data can be obtained from the SNC-Lavalin Data Protection Officer whose contact details are below.

## Third Party Web Sites

We may provide hyperlinks from the site to websites of third parties. Please note that this privacy statement applies only to the contents of this site and not to those websites to which we may provide a link.

## How to contact us to update your Personal Data or any queries you might have

If any information you have provided to us becomes inaccurate or out of date, or if you have any queries about this privacy statement, [please contact us via this website](#), or [via email to the Data Protection Officer whose contact details are below](#).

## What do I do if I have a complaint or spot a violation of our requirements?

Complaints and/or violations of our requirements about the processing of Personal Data by SNC-Lavalin should be raised with the Data Protection Officer in the first instance, and should follow the requirements outlined in the Data Privacy Compliance Policy Framework available on the SNC-Lavalin intranet.

The Data Protection Officer can be contacted at the following address:

**Data Protection Officer**

Data Privacy Compliance Team  
SNC-Lavalin  
500 Park Ave  
Almondsbury  
Bristol  
BS32 4RZ

**email:** [data\\_privacy@snclavalin.com](mailto:data_privacy@snclavalin.com)

Where an individual is not satisfied with the way we have handled a complaint they may refer the matter to the relevant Data Protection Regulator (for example, the UK Information Commissioner’s Office, the Office of the Privacy Commissioner of Canada etc.) for further consideration.

**What changes have been made to this Privacy Notice?**

Any changes to this Privacy Notice will be documented below.

Version 1            SNC-Lavalin Privacy Notice created May 2018

**Cookies and Google Analytics**

**Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

**Cookies**

When you visit our website, we use cookies, which are small pieces of information that allow us to maintain your connection to our website. These cookies do not collect or store any personally identifiable information. [How to disable cookies in your browser](#)

Name	Details	Nature of the Cookies	Cookie Type
__utma	tracks each user's amount of visits, and the time of the first, the previous, and the current visit (presumably partly for double checking).	Third Party	Permanent
__utmb	are used to track how long you stay on a site - when a visit starts and approximately ends	Third Party	Permanent

Name	Details	Nature of the Cookies	Cookie Type
__utmc	are used to track how long you stay on a site - when a visit starts and approximately ends This expires quickly	Third Party	Permanent
__utmz	tracks where a visitor came from (search engine, search keyword, link)	Third Party	Permanent
__utmz	enables website owners to track visitor behaviour measure of site performance	Third Party	Permanent

**Definitions:**

- “Permanent” Cookie - The cookie information is permanently stored on your device

We don't seek to collect your personal information and, where we do, we strive to anonymise your personal information where appropriate