

Broadshore Offshore Wind Farm

Privacy Notice

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Revision History

Rev.	Prepared By	Checked by	Approved by	Description	Date
1	Joanna Boag-Thomson (Shepherd and Wedderburn LLP)	Matt Smith	Chris Martin	For publication	05-05-23
2	Matt Smith <small>DocuSigned by:</small> <i>Matt Smith</i> <small>6356A026914F4DD...</small>	Chris Martin <small>DocuSigned by:</small> <i>Chris Martin</i> <small>52E0BC0E2702428...</small>	Susie Lind <small>DocuSigned by:</small> <i>Susie Lind</i> <small>A1A93AE4646F46C...</small>	For publication	31-01-24

1 Privacy Notice

Broadshore Offshore Wind Farm Limited (Broadshore) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about your privacy rights and tell you how we look after your personal data when you visit our website at www.broadshorewind.co.uk or when you provide us with your personal data in other ways, for example by contacting us through forms on our website or through phone calls, written communications or attending consultation events or meetings.

2 Important Information And Who We Are

Purpose Of This Privacy Notice

This privacy notice aims to give you information on how Broadshore collects and processes your personal data, including any data you may provide when you access or sign up to our supplier pages or when you engage in any consultation or supply chain events relating to the Project. The “Project” means the offshore wind farm located north of Fraserburgh and known as Broadshore.

It is important that you read this privacy notice together with any other privacy notice or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

Controller

This privacy notice is issued on behalf of Broadshore so when we mention "**Broadshore**", "**we**", "**us**" or "**our**" in this privacy notice, we are referring to BROADSHORE OFFSHORE WIND FARM LIMITED, a Scottish company (registered number SC719450). Broadshore is responsible for processing your data and is also the controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact Details

If you have any questions about this privacy notice or our privacy practices, please contact our data privacy manager in the following ways:

- Email address: dataprotection@broadshorewind.co.uk
- Postal address: Data Privacy Manager, Broadshore Offshore Wind Farm Limited, First Floor, 2 Lochrin Square, 96 Fountainbridge, Edinburgh, EH3 9QA.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes To The Privacy Notice And Your Duty To Inform Us Of Changes

We keep our privacy notice under regular review. This version was last updated on 31 January 2024.

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

Third-Party Links

The Project website may include links to third-party websites, plug-ins and applications. Accessing those links or enabling those connections may allow third parties 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 Project website, we encourage you to read the privacy notice of every website you visit.

3 The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, last name, username or similar identifier and title.
- **Contact Data** includes email address and telephone numbers, billing address and delivery address.
- **Financial Data** includes bank account and payment card details.
- **Supplier Data** includes details about payments to and from you as a supplier to us and other details of products and services you offer to provide to us and our other suppliers and potential suppliers.
- **Consultation Data** includes information you provide to us concerning yourself, your family, your business, your employer or any group on whose behalf you are authorised to respond, your feedback in response to any consultations relating to the Project, details from your social media accounts (including your interactions with us) and any other information you provide to us in connection with the Project.
- **Land and Property Data** includes information relating to your ownership or rental of land or property, any interest or rights you may have in respect of any land or property and information regarding any servitudes, wayleaves, easements, options, leases or consents over your land or property, how long you have owned it and details of any co-owners or others with rights over the land or property.
- **Vulnerability Data** includes details of any vulnerabilities so that we can adapt our practices accordingly.
- **Technical Data** includes internet protocol (IP) address, your login data, 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, information that we provide to you and, if applicable, our products and services.
- **Communications Data** includes your preferences in receiving communications from us and our other suppliers and potential suppliers and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If You Fail To Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to receive goods or services from you).

4 How Is Your Personal Data Collected?

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

- **Direct interactions.** You may give us your personal data by filling in forms on our Project website or by corresponding with us or our third party service providers by post, phone, email, social media or otherwise or by attending meetings. This includes personal data you provide when you:
 - subscribe to our notifications and updates.
 - give us information about your products and services.
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our Project website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Other sources.** We receive:
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based in the UK or European Economic Area (EEA).
 - Identity and Contact Data from data brokers or aggregators based in the UK or EEA.
 - Identity and Contact Data from publicly available sources (such as Companies House) based inside the UK.

5 How We Use Your Personal Data and Our Lawful Basis For Doing So

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 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 we need to comply with a legal obligation.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where you have provided your consent.

6 Sharing With Third Parties and Marketing

We will share your data with the following:

- **Internal Third Parties:**
 - Other companies in the group of companies of which we are part and who are based within the UK or EEA.
- **External Third Parties:**
 - Service providers who provide website IT and system administration services.
 - Professional advisers and consultants including lawyers, bankers, accountants, auditors, brokers and insurers.
 - Any relevant local planning authority or council.
 - Regulators and other authorities based in the United Kingdom.
 - Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

- **Marketing:**
 - In some cases we will appoint a third party to contact you about the Project, however, we will not pass any of your personal data to third parties for marketing purposes unless we tell you specifically. You have the right to withdraw consent to marketing at any time by contacting us.

7 Purposes For Which We Will Use Your Personal Data

We have set out below a description of all the ways we plan to use your personal data:

- To administer and protect our business and our Project website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To deliver relevant website content and notifications to you and measure or understand the effectiveness of the information you supply to us or other contractors/suppliers/potential suppliers.
- To use data analytics to improve our Project website, information sharing, products/services, marketing, supplier relationships and experiences.
- To make suggestions and recommendations to you about goods, services or opportunities that may be of interest to you.
- To record accurately and analyse any questions you raise during any consultation or feedback you have provided in response to a consultation.
- To report on any consultation, detailing feedback and issues that are raised and how we have responded to them (although the information contained in any consultation report will be aggregated and will not identify specific individuals).
- To personalise communications with anyone we are required to contact as part of future consultations or communications.
- To register you as a new supplier/potential supplier.
- To manage our relationship with you which will include:
 - Notifying you about changes to our terms or privacy notice.
 - Notifying you of potential supplier opportunities.
 - Notifying you of consultation events.

8 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Project website may become inaccessible or not function properly.

9 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 and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for 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 notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10 International Transfers

We do not transfer your personal data outside the UK or EEA. If we decide to do so in the future, we will ensure that appropriate safeguards, as required by UK data protection law, are applied.

11 Data Security

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. In addition, we limit access to your personal data to those 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 do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

12 Data Retention

How Long Will You Use My Personal Data For?

We will retain your personal data until the Project has been decommissioned in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

13 Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **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, though we may need to verify the accuracy of the new data you provide to 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 continuing to process 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 of erasure for specific legal reasons which will be notified to you, if applicable, 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 there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on 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 demonstrate 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 scenarios:
 - 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 require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify 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 provide to 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 initially provided consent for us 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Exercising Rights

If you wish to exercise any of the rights set out above, please contact us.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14 Location Of This Privacy Notice

This Privacy Notice is available in electronic form at www.broadshorewind.co.uk

A paper copy is available on request. Please contact our data privacy manager using the contact details set out above.