



## Privacy Policy

This privacy policy applies between you, the User of this Website and Navigation Management Limited, the owner and provider of this Website. Navigation Management Limited takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

**Please read this privacy policy carefully.**

### Definitions and interpretation

1. In this privacy policy, the following definitions are used:

<b>Data</b>	collectively all information that you submit to Navigation Management Limited via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
<b>Data Protection Laws</b>	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
<b>GDPR</b>	the General Data Protection Regulation (EU) 2016/679;
<b>Navigation Management Limited, or us</b>	Navigation Management Limited, a company incorporated in England and Wales with registered number 5901033 whose registered office is at 1KD Plaza, Hemel Hempstead, Hertfordshire, HP1 1AX;
<b>UK and EU Cookie Law</b>	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;





---

<b>User or you</b>	any third party that accesses the Website and is not either (i) employed by Navigation Management Limited and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Navigation Management Limited and accessing the Website in connection with the provision of such services; and
<b>Website</b>	the website that you are currently using, <a href="http://www.navigation-m.com">www.navigation-m.com</a> , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

---

2. In this privacy policy, unless the context requires a different interpretation:
- a. the singular includes the plural and vice versa;
  - b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
  - c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
  - d. "including" is understood to mean "including without limitation";
  - e. reference to any statutory provision includes any modification or amendment of it;
  - f. the headings and sub-headings do not form part of this privacy policy.

### Scope of this privacy policy

3. This privacy policy applies only to the actions of Navigation Management Limited and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
4. For purposes of the applicable Data Protection Laws, Navigation Management Limited is the "data controller". This means that Navigation Management Limited determines the purposes for which, and the manner in which, your Data is processed.



## Data collected

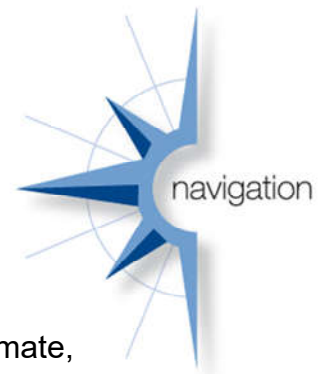
5. Navigation Management Limited collects and processes personal data relating to clients, main contractors, specialist sub-contractors, consultants and others in connection to the property and construction sector (collectively referred to herein as 'working contacts'):

## How we collect Data

6. Navigation Management Limited will collect Data in a number of ways, for example:
  - a. data is collected automatically.
  - b. data is collected from project details in which the company is involved with (directly or indirectly) whether the clients be limited companies or private individuals.
  - c. data is collected in order that Navigation Management Limited is able to provide its professional services, to comply with its legal obligations and to comply with its professional indemnity insurance requirements.
  - d. Navigation Management Limited needs to process data so that it can enter into contractual arrangement with its clients (whether limited companies or private individuals) so that it is able to meet its contractual obligations under these contracts. Its contractual obligations may include compiling project information, contacting potential project contractors or specialist sub-contractors or consultants and requesting and reviewing pre-qualification information.

## Our use of Data

7. Navigation Management Limited will retain personal data before, during and after the end of any contractual obligation with its client(s).
  - a. internal record keeping as is required to fulfil any legal or contractual obligations.
  - b. in order to respond to and defend against any legal claim(s).
  - c. in order that it may seek professional references for accreditations or potential appointments.



- d. where Navigation Management Limited may have to rely on legitimate, professional and any legal reasons for retaining personal information.
- e. Navigation Management Limited will retain any and all data that is required for it to meet professional, legal, professional indemnity insurance purposes and any and all contractual obligations for as long as may be required.

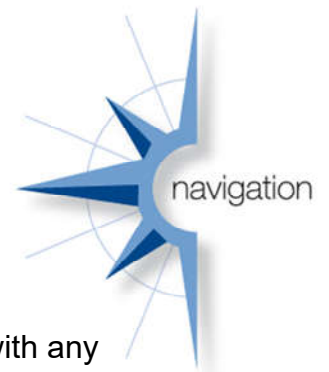
## Who we share Data with

- 8. We may share your Data with the following groups of people for the following reasons:
  - a. any of our group companies or affiliates - to ensure the proper administration of our website, software systems and business procedures;
  - b. our employees, agents and/or professional advisors - to enable the provision of our services, to seek references if applicable, and to obtain advice from professional advisers;
  - c. Navigation Management Limited may on occasion be required to share your data with third parties in order to fulfil contractual obligations, obtain professional advice and to meet any legal or contractual obligations.

## Keeping Data secure

- 9. Navigation Management Limited has internal policies and controls in place to ensure that data is not lost, accidentally destroyed, misused to disclosed, and is not accessed except by its employees in the performance of their duties.
  - a. data is secured on secure servers.
  - b. any access to data is further restricted by the use of complex passwords.
  - c. all employee's computers or laptops are protected against virus or malware by using high level security products.
  - d. access to email data is control using passwords and encrypted transport methods.
  - e. should Navigation Management Limited engage any third parties to process any personal data on its behalf, it is done on the basis that they are under duty of confidentiality and are therefore obliged to implement any technical and / or organisation measures to ensure the security of data.





- f. Technical and organisational measure include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your data, please let us know immediately by contacting us via this e-mail address: [admin@navigation-m.com](mailto:admin@navigation-m.com).
- g. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## Data Retention

- 10. Unless a longer retention period is required or permitted by law, we will only hold your data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the data be deleted.
- 11. Navigation Management Limited will hold the personal data of working contacts for as long as it is reasonable needed for the purpose that it was collected, to meet any liability under client appointment and obligations, any professional indemnity insurance requirements, any legal obligations and any client's contractual requirements.
- 12. Even if we delete your data, it may persist on backup or archival media for legal, professional or contractual obligations.

## Your rights

- 13. You have the following rights in relation to your Data:
  - a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
  - b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
  - c. **Right to erase** - the right to request that we delete or remove your Data from our systems.





- d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
  - e. **Right to data portability** - the right to request that we move, copy or transfer your Data.
  - f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
14. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [admin@navigation-m.com](mailto:admin@navigation-m.com).
15. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.
16. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it, please contact us via this e-mail address: [admin@navigation-m.com](mailto:admin@navigation-m.com).

## Transfers outside the European Economic Area

17. Data which we collect from you may be stored and processed in and transferred to countries outside of the European Economic Area (EEA). For example, this could occur if our servers are located in a country outside the EEA or one of our service providers is situated in a country outside the EEA.
18. We will only transfer Data outside the EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, eg by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission, or by signing up to the EU-US Privacy Shield Framework, in the event that the organisation in receipt of the Data is based in the United States of America.
19. To ensure that your Data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your Data with. This ensures your Data is treated by those third parties in a way that is consistent with the Data Protection Laws.







## Changes of business ownership and control

20. Navigation Management Limited may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Navigation Management Limited. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
21. We may also disclose Data to a prospective purchaser of our business or any part of it.
22. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## General

23. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
24. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
25. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
26. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.





## Changes to this privacy policy

27. Navigation Management Limited reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact Navigation Management Limited by email at [admin@navigation-m.com](mailto:admin@navigation-m.com).

## Attribution

Part of this privacy policy was created using a document from Rocket Lawyer (<https://www.rocketlawyer.co.uk>).

Signed: Simon Dewar  
Position: Managing Director  
Dated: 30<sup>st</sup> January 2020

