B. & M. McHugh Limited
PRIVACY POLICY STATEMENT

Policy Statement

B. & M. McHugh Ltd is a Business-to-Business (B2B) organisation but in the day to day running of the business there will be occasions where we may need to store and process data of UK and EU citizens for legal and business requirements.

The collection, storage and processing of this information shall comply with the requirements set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Aims of this Policy

B. & M. McHugh Ltd is committed to ensuring that we store and processes data of UK and EU citizens within the legal requirements set out within the General Data Protection Regulation (GDPR).

Achieving this Policy

B. & M. McHugh Ltd aims to achieve this policy by:

- Appointing a Data Protection Officer;
- Understanding and recording the lawful basis of why and what personal data we hold and process at all times (e.g., contractual necessity, legal obligation, legitimate interests, or consent);
- Design procedures that require the storage and processing of personal data with privacy in mind and set as the default;
- Implementing appropriate technical and organisational measures to secure personal data, including access controls and encryption;
- Having a process in place to detect, notify and investigate data breaches;
- Ensuring that requests for personal data requires opt in consent where consent is the lawful basis for processing;
- Ensuring the sharing of personal data with 3rd parties has a lawful basis and those parties have a privacy policy in place;
- Ensuring that reasonable Subject Access Requests (SAR) are dealt with within one month of the request and without charge.

Data Sharing and Retention

Personal data may be shared with clients (e.g., Network Rail, local authorities), regulatory bodies, service providers, and professional advisers, where required. Where personal data is shared with third parties, appropriate contractual safeguards and data processing agreements will be in place. All third parties are required to adhere to strict data protection obligations.

Personal data will only be retained for as long as necessary to fulfil the purposes for which it was collected and to meet legal or contractual obligations.

Data Breach Reporting

Personal data breaches will be assessed and, where required, reported to the Information Commissioner's Office (ICO) within 72 hours in accordance with UK GDPR requirements.

Individual Rights

Individuals have rights under the UK GDPR, including the right to access, rectify, erase, restrict, or object to the processing of their data. They also have the right to data portability and to lodge a complaint with the Information Commissioner's Office (ICO). Requests or concerns regarding personal data should be directed to the Data Protection Officer.

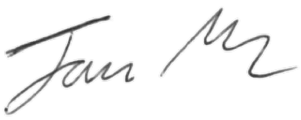
Responsibility for this Policy

The Managing Director is the director responsible for the implementation of the board policy, together with the data protection officer, each director and manager within their own realm of responsibility. All employees are responsible for understanding and adhering to this policy.

Review of this Policy

This policy is subject to annual review by the Head of HSQE & the Managing Director to ensure that the management system is effective, consistently implemented and continually improved. It is made available in all site folders, information boards and on OneNote.

All employees are encouraged to actively participate in the development and implementation of company policies and processes through feedback loops and dedicated forums.



James McHugh
Managing Director
March 2026