

PARAGON ARCHITECTURE & CONSTRUCTION CUSTOMER PRIVACY NOTICE

REGISTERED NAME: Paragon Architecture & Construction Ltd

We are the controller of your personal data. For more information on controllers and their responsibilities please see our guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

CONTACT DETAILS

Post

Paragon Architecture & Construction Ltd
Unit 7 Edison Buildings, Electric Wharf, Coventry, CV1 4JA, GB

Telephone

0121 274 0831

Email

info@paragonarchitecture.co.uk

WHAT INFORMATION WE COLLECT, USE, AND WHY

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Occupation
- Third party information (such as family members or other relevant parties)
- Payment details (including bank account details where provided for refunds or other payment administration)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Information relating to compliments or complaints
- Video or audio recordings of online meetings, where a meeting is recorded
- Audio recordings of business telephone calls
- Meeting transcripts, AI-generated notes, summaries and records of meetings and decisions
- Website user information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

Cookies, analytics and online advertising

When you use our website, we may collect information about how you interact with it, including IP address, device and browser information, pages visited, referral information and interactions with our website. We use this information to understand website performance, improve our website and services, measure marketing effectiveness and, where you have consented, support online advertising.

We use a consent management platform, Cookiebot, to manage consent for non-essential cookies and similar technologies. Where consent is required, non-essential analytics and advertising cookies will only be used in accordance with the choices you make through our cookie consent controls.

We use services including Google Analytics and Google Ads. These services may process online identifiers and information about your interaction with our website. You can change or withdraw your cookie choices through the cookie settings available on our website.

Further information about the cookies and similar technologies used on our website, their purposes and applicable retention periods is available in our **Cookie Policy**.

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Client account information
- Health and safety information
- Any other personal information required to comply with legal obligations

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information

We also collect or use the following special category information for **recruitment and employment purposes**.

This information is subject to additional protection due to its sensitive nature:

- Health information, including information relating to disability, sickness absence, fit notes, reasonable adjustments and workplace health and safety, where relevant to recruitment or employment.

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Payment details
- Account information
- Purchase or service history
- CCTV images and video footage from areas covered by CCTV at our premises
- Relevant telephone or online meeting recordings, transcripts and meeting records
- Witness statements and contact details
- Photographs
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information

- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following special category information for **dealing with queries, complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Health information

LAWFUL BASES AND DATA PROTECTION RIGHTS

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in operating and improving our architectural and construction consultancy services, maintaining appropriate client and project records, managing client relationships, improving our processes and service quality, and protecting our business and clients. We only use personal information where necessary and proportionate for these purposes and where our interests are not overridden by the rights and interests of the individuals concerned.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in effectively administering client accounts and project records, managing our client relationships, maintaining accurate business records and protecting our business interests. We only process information where necessary and proportionate and where these interests are not overridden by the rights and interests of the individuals concerned. Where consent is required for non-essential cookies, analytics or advertising technologies, we rely on your consent. You can withdraw or change your consent at any time through our website cookie settings.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in maintaining relationships with existing and prospective clients, following up enquiries, informing clients about relevant services and developing our business. We only use personal information for appropriate and proportionate marketing and respect individuals’ rights and marketing preferences.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment and employment purposes** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in recruiting suitable individuals, assessing candidates’ suitability for roles, managing our recruitment process and maintaining appropriate recruitment records. We only process information where necessary and proportionate and where these interests are not overridden by the rights and interests of candidates.
- Special category information – Where we process health information in connection with recruitment or employment, such as information about disability, reasonable adjustments, sickness absence, fit notes or workplace health and safety, we will only process this information where an additional condition for processing special category information applies. Where applicable, we rely on **Article 9(2)(b) UK GDPR**, where processing is necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment, social security or social protection law. Where required, we also rely on the relevant condition under **Schedule 1 of the Data Protection Act 2018**.

Where health information is necessary for the establishment, exercise or defence of legal claims, we may rely on **Article 9(2)(f) UK GDPR**.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We have a legitimate interest in responding to enquiries and complaints, investigating disputes, maintaining appropriate records, establishing or defending legal claims, and protecting our clients and business. We only process information where necessary and proportionate and where these interests are not overridden by the rights and interests of the individuals concerned.
- Special category information – Where a complaint, dispute, incident or claim involves health information or other special category information, we will only process that information where an additional condition for processing special category information applies. This may include **Article 9(2)(f) UK GDPR**, where processing is necessary for the establishment, exercise or defence of legal claims. Where another special category condition is required by law, we will apply the relevant condition and any applicable requirements under the Data Protection Act 2018.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

WHERE WE GET PERSONAL INFORMATION FROM

- Directly from you
- CCTV footage or other recordings
- Legal bodies or professionals (such as courts or solicitors)
- Debt collection agencies
- Publicly available sources
- Previous employers and referees, where references or employment information are obtained as part of recruitment
- Providers of marketing lists and other personal information
- Suppliers and service providers
- Third parties:
 - Property owners, joint applicants, landlords, tenants, architects and other construction professionals, contractors, structural engineers, planning consultants, building control professionals, local authorities, estate and commercial property agents, professional advisers, referral partners and other persons or organisations involved in a client's property or construction project.

HOW LONG WE KEEP INFORMATION

We keep personal information only for as long as reasonably necessary for the purposes for which it was collected, including to provide our services, maintain appropriate professional records, meet legal, tax and regulatory obligations, and establish, exercise or defend legal claims.

Our standard retention periods are:

- **Architectural, project and professional indemnity records:** We generally retain substantive project records for **15 years after completion or termination of our services**. This may include architectural drawings, surveys, specifications, photographs, design records, client instructions, material correspondence, consultant information and other records forming part of the professional project

file. This period reflects the nature of architectural services and the need to maintain appropriate records in connection with potential professional liability and insurance matters.

- **Contracts, appointments and fee agreements:** We generally retain signed appointments, contracts, agreed terms, variations, scope changes and associated contractual records for **15 years after completion or termination of our services**, where they form part of the professional project record.
- **Planning and Building Control records:** Planning applications, drawings, decisions, conditions, Building Regulations information, Building Control correspondence and related records forming part of a project file are generally retained for **15 years after completion or termination of our services**.
- **Financial, accounting, tax and VAT records:** We generally retain invoices, payment records, accounting information and supporting tax and VAT records for **6 years after the end of the relevant financial or accounting period**, or longer where required by HMRC or another legal obligation.
- **Enquiries, leads and unsuccessful quotations:** Where you enquire about our services but do not appoint us, we generally retain your enquiry, quotation and relevant follow-up information for **up to 2 years after our last meaningful contact with you**. Information may be deleted earlier where it is no longer required.
- **Marketing information:** We retain information used for direct marketing for as long as it remains appropriate for us to contact you and we have a lawful basis to do so. We periodically review our marketing records. If you opt out or object to direct marketing, we may retain limited information on a **suppression list for as long as necessary** to ensure that your preference continues to be respected.
- **Recruitment information:** Information relating to unsuccessful applicants, including CVs, applications, interview notes and assessment records, is generally retained for **6 months after the recruitment process ends**. Where you agree that we may retain your details for consideration for future opportunities, we may retain them for **up to 12 months**. Information relating to successful applicants may become part of their employee record.
- **Employee information:** Employment and personnel records are retained for different periods depending on the type of information and applicable legal requirements. Core employment records are generally retained for **up to 6 years after employment ends**. Certain payroll, tax, right-to-work, pension, health and safety and other statutory records may be retained for different periods where required by law.
- **CCTV:** CCTV footage is generally retained for **up to 30 days**, after which it is overwritten or securely deleted. Relevant footage may be retained for longer where necessary to investigate an incident, respond to a complaint, establish or defend a legal claim, assist law enforcement or meet an insurance or legal requirement.
- **Telephone calls, online meeting recordings and transcripts:** Where business telephone calls are recorded, or online meetings conducted through services such as Microsoft Teams, Zoom or Google Meet are recorded or transcribed, including using AI-assisted transcription or meeting-note functionality, the resulting recordings, transcripts and meeting notes are retained only for as long as reasonably necessary for the purpose for which they were created. Routine recordings and transcripts will normally be deleted within **90 days**. Where information from a recording or transcript is required as part of a project, complaint, contractual or legal record, the relevant information may be retained for the applicable longer retention period.
- **Microsoft 365, Outlook, Teams and SharePoint:** These systems are used to store and manage different types of business information. Information is therefore retained according to the nature of the underlying record rather than simply because it is stored within Microsoft 365. For example, a project record may be retained for 15 years, whereas an unsuccessful recruitment record would normally be retained for 6 months. Routine emails, duplicate documents and administrative communications are deleted when they are no longer required.
- **Complaints, disputes and claims:** Records relating to complaints, disputes, professional indemnity matters, threatened claims or legal proceedings may be retained for **up to 15 years after the matter is finally concluded**, or longer where reasonably necessary on the advice or requirement of our insurers, professional advisers or legal representatives.
- **Website and cookie information:** Information submitted through our website is retained according to its purpose. An enquiry that does not become a project will normally be retained for up to 2 years. Cookie, analytics, consent and technical information is retained in accordance with the applicable cookie or service settings and is periodically reviewed. Further information about cookies is provided in our Cookie Policy.

These are our standard retention periods. In some circumstances, we may need to keep information for longer, including where required by law, HMRC, our insurers or professional advisers, or where information is relevant to an actual or reasonably anticipated complaint, investigation, dispute or legal claim. Where this applies, deletion may be suspended until the relevant matter has been resolved and the information is no longer reasonably required.

Where information is no longer required, we will securely delete or anonymise it in accordance with our data retention procedures. Anonymised information that can no longer identify an individual may be retained for statistical, analytical and business planning purposes.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

WHO WE SHARE INFORMATION WITH

Data processors

IT, cloud hosting, communications, accounting, CRM, website, analytics, cookie management and other business software service providers

This data processor does the following activities for us: They provide cloud storage, email and communications, document and project management, CRM and client administration, accounting and payment support, website hosting and operation, analytics, cookie consent management, IT support and other business systems. They may process or store personal information on our behalf when providing these services.

Others we share personal information with

- Debt collection agencies
- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Organisations we're legally obliged to share personal information with, including HMRC, courts, law-enforcement or regulatory authorities and other public bodies where disclosure is required by law.
- Local authorities, planning authorities and Building Control bodies, where necessary to submit, administer and progress applications, approvals and other matters relating to your project.
- Publicly on our website, social media or other marketing and information media
 - Testimonials and project marketing: We may publish client testimonials, reviews and information about completed or ongoing projects on our website, social media or other marketing materials. This may include architectural drawings, visualisations, photographs and before-and-after images. We seek to minimise the personal information published and will not ordinarily publish a client's full name or full residential address. Testimonials may be attributed using initials, surname and/or a general location. Where consent is required for the publication of personal information, we will obtain it before publication.
- Suppliers and service providers
- Professional consultants
- Third parties:
 - Local authorities and planning authorities, Building control bodies, Structural engineers, planning consultants and other professional consultants, Contractors and other construction professionals, Property and estate agents, Joint applicants, property owners, landlords and tenants, Insurers and insurance intermediaries, Professional and legal advisers, Accountants, regulatory and statutory bodies, Other organisations or persons involved in delivering or administering a client's project

SHARING INFORMATION OUTSIDE THE UK

Some of the service providers and technology platforms we use may process, store or access personal information outside the United Kingdom. This may include countries in the European Economic Area (EEA), the United States and other countries in which our service providers or their approved sub processors operate. Where personal information is transferred outside the UK, we take steps to ensure that the transfer is made in accordance with UK data protection law.

Depending on the country and recipient, we may rely on:

- UK adequacy regulations, where the UK has determined that the relevant country, territory or framework provides an adequate level of protection;
- the UK Extension to the EU-US Data Privacy Framework, where applicable to an eligible and certified US recipient;
- the UK International Data Transfer Addendum to the European Commission Standard Contractual Clauses;
- the UK International Data Transfer Agreement;
- approved Binding Corporate Rules; or
- another lawful transfer mechanism or exception permitted under UK data protection law.

Service providers whose use may involve international processing or transfers include providers of cloud computing, email and document management, accounting, electronic signatures, architectural and design software, communications, website analytics and advertising, and other business technology services. These may include Microsoft, Google, Adobe, Autodesk, Xero, DocuSign, Canva and Meta/WhatsApp, depending on the services we use.

For example, some of our providers use contractual safeguards such as the UK Addendum to the Standard Contractual Clauses, while others may also rely on approved Binding Corporate Rules, UK adequacy arrangements or the UK Extension to the EU-US Data Privacy Framework where the relevant requirements are met.

We periodically review the services we use and the safeguards applicable to international transfers.

You can contact us using the details provided in this privacy notice if you would like further information about an international transfer of your personal information or the safeguards that apply.

HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: info@paragonarchitecture.co.uk

Telephone: 0121 274 0831

Post: Unit 7 Edison Buildings, Electric Wharf, Coventry, CV1 4JA

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>