

1. Who is responsible for your personal data?																			
This Privacy Notice (“Notice”) applies whenever Balfour Beatty plc, its subsidiary companies, group affiliates, joint venture entities or associated businesses (referred to in this Notice as “Balfour Beatty”, “we” or “us”) processes any personal data about you, such as collecting it, using it and storing it, for the reasons listed under section 4 below. It describes how and why we process your personal data and the rights you can exercise. This Notice sits alongside and supplements Balfour Beatty’s Employee Privacy Notice (found on Balfour Beatty’s Business Management System), Project Privacy Notice (found here: https://www.balfourbeatty.com/services/privacy/project-privacy-notice/) and Website Privacy Notice (found here: https://www.balfourbeatty.com/services/privacy/). If there is any conflicting information between this Notice and these other privacy notices, then this Notice prevails. Balfour Beatty is the controller of the personal data that we process as part of this Notice, unless otherwise stated.																			
2. Personal data we collect and process about you																			
We currently collect and process the following personal data for the purposes described under section 4:																			
<table><tr><th>Category of personal data</th><th>Examples of what we collect and process</th></tr><tr><td>Browsing information</td><td>IP address, unique user and computer identifier (browser cookie), date and time of first and latest login and activity.</td></tr><tr><td>Contact information</td><td>Email address, first and last name, profile picture, job title, link to user profiles (Teams and Viva Engage).</td></tr><tr><td>User activity information</td><td>Personal data contained in idea submissions, posts or comments made through Microsoft Teams, Viva Engage or Sideways6 online forms, including professional or organisational information and campaign or event-related information. Record of these interactions are also stored.</td></tr></table>		Category of personal data	Examples of what we collect and process	Browsing information	IP address, unique user and computer identifier (browser cookie), date and time of first and latest login and activity.	Contact information	Email address, first and last name, profile picture, job title, link to user profiles (Teams and Viva Engage).	User activity information	Personal data contained in idea submissions, posts or comments made through Microsoft Teams, Viva Engage or Sideways6 online forms, including professional or organisational information and campaign or event-related information. Record of these interactions are also stored.										
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3. How we obtain your personal data																			
The personal data we process is provided to us directly by you.																			
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We obtain and process your personal data for the following reasons:																			
<table><tr><th>Purpose for processing</th><th>Justification</th></tr><tr><td>Promoting and realising innovation within the business</td><td>Innovation programmes like My Contribution (MyC) harness the creativity and insights of employees and other participants to drive business improvements. These programmes encourage idea sharing, leading to new solutions and enhanced products, services and processes. Sideways6 software integrates with tools like Microsoft Teams and Viva Engage to capture and provides online forms to capture, manage and prioritise ideas. AI features may also be used to enhance efficiency and engagement.</td></tr><tr><td>Legal claims</td><td>We may also process your personal data for establishing, defending or pursuing potential legal claims.</td></tr></table>		Purpose for processing	Justification	Promoting and realising innovation within the business	Innovation programmes like My Contribution (MyC) harness the creativity and insights of employees and other participants to drive business improvements. These programmes encourage idea sharing, leading to new solutions and enhanced products, services and processes. Sideways6 software integrates with tools like Microsoft Teams and Viva Engage to capture and provides online forms to capture, manage and prioritise ideas. AI features may also be used to enhance efficiency and engagement.	Legal claims	We may also process your personal data for establishing, defending or pursuing potential legal claims.												
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We do not make decisions based solely on automated processing, including profiling, that have legal or similarly significant effects.																			
5. Sharing and transferring your personal data																			
Your personal data may be shared, where necessary, with:																			
<table><tr><th>Category of recipient</th><th>Reason for sharing your personal data</th></tr><tr><td>Hotjar</td><td>Utilised for capturing user analytics and insights.</td></tr><tr><td>Intercom</td><td>Facilitates the user support process through an in-app chat and email.</td></tr><tr><td>Microsoft Azure</td><td>Supports IaaS cloud hosting, text analysis, and generative AI features within the Sideways6 platform.</td></tr><tr><td>Mixpanel</td><td>Employed to conduct product analysis and derive insights.</td></tr><tr><td>Sideways6</td><td>Serves as the provider and primary developer of the idea management platform.</td></tr><tr><td>Twilio SendGrid</td><td>Facilitates the distribution of email communications via the Sideways6 platform.</td></tr><tr><td colspan="2">Regulators, public authorities, insurers, law firms, dispute resolution bodies or the courts.</td></tr><tr><td colspan="2">Subsidiary companies, group affiliates, joint venture entities or associated businesses, advisors and auditors.</td></tr></table>		Category of recipient	Reason for sharing your personal data	Hotjar	Utilised for capturing user analytics and insights.	Intercom	Facilitates the user support process through an in-app chat and email.	Microsoft Azure	Supports IaaS cloud hosting, text analysis, and generative AI features within the Sideways6 platform.	Mixpanel	Employed to conduct product analysis and derive insights.	Sideways6	Serves as the provider and primary developer of the idea management platform.	Twilio SendGrid	Facilitates the distribution of email communications via the Sideways6 platform.	Regulators, public authorities, insurers, law firms, dispute resolution bodies or the courts.		Subsidiary companies, group affiliates, joint venture entities or associated businesses, advisors and auditors.	
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Where data is transferred outside of the European Economic Area (EEA) or the UK, we ensure that appropriate safeguards are in place, for example the International Data Transfer Addendum or International Data Transfer Agreement issued by the Information Commissioner’s Office (ICO) in the UK and the Standard Contractual Clauses adopted by the European Commission. For more information on international data transfers and the appropriate safeguards that we apply, where applicable, and how you can receive a copy of them, please contact our Data Privacy Team at dataprivacy@balfourbeatty.com.																			
6. Lawfulness for processing your personal data																			
Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this personal data are:																			
<table><tr><th>Lawful basis</th><th>Further details or justification (where relevant)</th></tr><tr><td>Legitimate interests</td><td>Sideways6 facilitates innovation programmes such as My Contribution (MyC). These programmes harness participants' insights and creativity to drive business improvements and innovation by enabling ideas to be submitted, assessed, managed and developed.</td></tr></table>		Lawful basis	Further details or justification (where relevant)	Legitimate interests	Sideways6 facilitates innovation programmes such as My Contribution (MyC). These programmes harness participants' insights and creativity to drive business improvements and innovation by enabling ideas to be submitted, assessed, managed and developed.														
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7. How we store your personal data																			
Your personal data is securely stored and we only keep it for as long as it is necessary for Balfour Beatty to process it for the purposes described in this Notice and in accordance with our own retention policies (available here: https://www.balfourbeatty.com/recordsmanagement/). Sideways6 retains data on its platform for the duration of its engagement with Balfour Beatty and for up to 30 days after the engagement ends. Upon contract termination, customer data submitted to Sideways6 is stored in its databases for 30 days, after which it is either overwritten or deleted from its Microsoft Azure tenant. We will retain personal data we collect from you where we have an ongoing and valid business reason to do so (for example, to comply with applicable legal, tax or accounting requirements). When we have no ongoing and valid business reason to process your personal data, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), we will securely store your personal data and isolate it from any further processing until deletion is possible.																			
8. Your data protection rights																			

Under data protection law, you have rights including:

Individual rights	Further details
Your right of access	You have the right to ask us for copies of your personal data.
Your right to rectification	You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
Your right to erasure	You have the right to ask us to erase your personal data in certain circumstances.
Your right to restriction of processing	You have the right to ask us to restrict the processing of your personal data in certain circumstances.
Your right to object to processing	You have the right to object to the processing of your personal data in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact the Data Privacy Team at dataprivacy@balfourbeatty.com if you wish to make a request and exercise any of these rights.

9. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at dataprivacy@balfourbeatty.com. You can also make a complaint to the supervisory authority – in the UK that is the Information Commissioner’s Office (ICO) whose details are here: www.ico.org.uk/make-a-complaint/.

10. Contact us

If you have any questions about this Notice, or how Balfour Beatty processes your personal data, please reach out to our Data Privacy Team at dataprivacy@balfourbeatty.com. You can also contact our Data Protection Officer at this same email address.

11. Updates to this Notice

We may update this Notice from time to time in response to legal, technical or business developments. If we make any material changes to how we process and use your personal data, we will notify you to inform you of the change.

You can see when this Notice was last updated by checking the “last updated” date displayed at the end of this Notice.

Last updated: 03/09/26