



# Privacy and data protection

## Purpose

This policy describes the compliance framework that applies to Mott MacDonald's processing of personal information associated with its workforce, clients, project beneficiaries and other stakeholders.

In an increasingly digital and connected world, we are determined to maintain the trust and confidence of every individual whose personal information we collect, access, analyse, or process in some other way.

## Commitment

The Group is committed to meeting its legal and regulatory obligations under privacy and data protection laws and respecting the rights of the individuals whose personal information we process.

We also recognise the increasing emphasis placed by our clients on privacy and data protection issues and ensure that our services and operations support their processing of personal information in a secure and legally compliant manner.

When processing personal information, the Group adopts a 'data protection by design and default' approach and adheres to the principles of the United Kingdom General Data Protection Regulation (UK GDPR): lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; and accountability.

Where possible, we extend the individual rights enshrined in the UK GDPR to all Group employees located outside of the UK. We also recognise the need to comply with the obligations of similar laws in the jurisdictions where we operate.

## Responsibility

The Executive Board is accountable for the Group's compliance with privacy and data protection laws. An Executive Board director is responsible for this policy and for its effective implementation.

The Group privacy and data protection officer operates independently, is accessible to the individuals whose personal information we process, provides advice and guidance on privacy and data protection issues, and monitors compliance.

The Group head of IT is responsible for overseeing the implementation of measures that support compliance with privacy and data protection requirements across our IT applications, systems, and networks.

General managers are responsible for monitoring and reviewing compliance with privacy and data protection requirements within their business unit, division or region.

A global network of designated privacy practitioners is responsible for promoting compliance and advising colleagues on the local implementation of privacy and data protection requirements.

All staff must comply with the requirements of our privacy and data protection compliance framework and complete privacy and data protection training on an annual basis.



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## Approach

Our approach to processing personal information across our global operations is intended to maintain compliance with the UK GDPR and any other privacy and data protection laws that apply in the jurisdictions where we operate. This includes the creation of comprehensive records of processing and the use of legally compliant mechanisms to facilitate cross-border transfers of personal information.

Our business management system (certified to ISO 9001, ISO/IEC 27001 and Cyber Essentials Plus), corporate intranet and e-learning content define the requirements and processes that enable us to manage personal information securely and in accordance with privacy and data protection laws.

As well as specific legal and regulatory requirements, our approach to the processing of personal information is guided by our Group ethics policy and our corporate PRIDE values of respect and integrity.

A handwritten signature in black ink, appearing to read 'M Haigh'.

**Mike Haigh**  
Executive Chair