

**COU-POL-025**  
**DATA PRIVACY POLICY**

It is the policy of Cousins Ltd and its subsidiaries to comply with the requirements of the EU General Data Protection Regulation 2016, and to maintain the conditions necessary to meet our obligations as both a Data Controller and a Data Processor in respect of personal data, defined in the GDPR as 'any data that identifies a living person'.

Our processes accord with the principles on which the Regulation is based, namely that personal data is: -

- a) processed lawfully, fairly, and in a transparent manner about individuals;
- b) collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant, and limited to what is necessary about the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step is taken to ensure that inaccurate personal data, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to the implementation of the appropriate technical and organisational measures required by the GDPR to safeguard the rights and freedoms of individuals;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage, using appropriate technical or organisational measures.

We will maintain systems and procedures to enable us to evidence how we are complying with the rights of individuals as defined in the Regulation.

Responsibility for implementing this Policy resides with the Directors of Cousins Ltd.



T Wilkinson  
**Group Operations Director**

05/01/2026