

Effective From  
3 May 2022

## Privacy Notice for Shareholders

This privacy notice describes how MJ Gleeson plc and other members of our group of companies (which we will refer to as “Gleeson”, “us” or “we”) collect, process, use and protect personal information. Gleeson is committed to respecting the privacy of its shareholders and other stakeholders. We take data protection very seriously and comply with all relevant legislation when handling any personal information given or received from you or third parties.

This privacy notice applies to all personal information that you, or a third party, provides to us. By providing Gleeson (or our authorised third parties) with information or using our website you agree to be bound by this notice in respect of the personal information collected about you.

This notice may change from time to time, so please check it regularly.

### **This is the personal information we collect**

In the course of our interactions with you we may collect some or all of the following information:

- Your name
- Your email address
- Your telephone number
- Your address
- Your banking details (including the name of your bank, your bank account number, and sort code)
- Your national insurance number
- Your date of birth, place of birth and nationality
- Your share identification number
- The number of shares you hold, and details of all relevant share transactions
- Your voting instructions
- Information that you provide by completing forms we provide to you, or when you engage with Gleeson
- Your opinions pertaining to sustainability and / or Gleeson’s business

We do not collect any special category data.

### **This is how we collect your personal information**

- From the information you provide directly to us, or through your agents such as your stockbroker or share plan administrator
- From the information you provide to our registrar, Link Group
- When you register for alerts or other products and / or services through our website.

## **This is why we collect and how we use your personal information**

- Managing your shareholding in MJ Gleeson plc
- Contacting you with shareholder information, such as details of our Annual General Meeting and our resolutions and reports
- Administering your instructions as a shareholder
- To make dividend payments
- Maintaining an up to date share register
- For direct shareholder engagement
- To conduct studies and surveys to help improve our products and the services we offer to Gleeson's shareholders

We will only collect and use your personal information where the law allows us to do so. If we collect information from you during a shareholder engagement process such as a questionnaire or conversation, we will only use your personal information where it is necessary for our legitimate interests and your fundamental rights do not override those interests.

## **The legal basis we rely on to process your personal information**

Under Data Protection legislation we are allowed to process your personal information if we meet certain conditions. The reasons for processing that we rely on are as follows:

1. In the performance of a contract  
We need to process your personal information when it is necessary to perform a contract, such as when you purchase shares.
2. In the performance of our legal obligations  
Where we are required to do so by law, we will disclose your personal information, for example, where your personal information is requested by a law enforcement agency.
3. Where we have a legitimate interest to in doing so  
Where we consider that the use of your personal information is necessary to achieve a legitimate interest of Gleeson, for example, in our direct communication to you as a shareholder, and only if we've balanced Gleeson's interest against your interests, rights and freedoms. Many of the reasons that we collect your personal information will fall under this category.
4. With your consent  
Generally, we do not rely on consent as a legal basis for processing your personal information although we will get your consent before sending third party direct marketing communications to you, or as otherwise set out in this privacy notice. You have the right to withdraw consent to marketing at any time by contacting us.

Who we share your personal information with

We do not share your information outside of Gleeson, except with selected third parties that work on our behalf, to provide you with a product or service that is relevant to you as a shareholder.

These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your information. These third parties can include but are not limited to: our service

providers (including our registrar, Link Group), our business partners, professional advisors, auditors, other members of the Group and our regulators (including the Financial Conduct Authority, the London Stock Exchange, HM Revenue and Customs and the Information Commissioner's Office).

Sometimes your personal information may be sent to other parties outside of the United Kingdom (UK) and the European Economic Area (EEA) in connection with the purposes set out above. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this Privacy Notice, and in doing so may rely on certain "transfer mechanisms" such as the standard contractual clauses approved by the European Commission. If you would like further information, please contact us.

#### How long we will hold your personal information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### Your Rights

Under Data Protection legislation you have a number of rights. These include:

- The right to know how we use and handle your personal information
- The right to access the personal information that we are handling and to information contained within this privacy notice
- The right to anonymise your personal information, or for us to correct any mistakes in the information we hold
- The right at any time to object to direct marketing or for you to be removed from our databases or mailing lists
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

If you have any questions or complaints relating to how we use your personal information, or if you wish to exercise any of your rights regarding your personal information, please write to us at the following address and enclose appropriate identification in order that we may confirm your identity:

Company Secretary  
MJ Gleeson PLC  
6 Europa Court  
Sheffield Business Park  
Sheffield  
S9 1XE

Information Commissioner's Office

You may contact the Information Commissioner's office to log a complaint either via their website: [ico.org.uk](https://ico.org.uk) or by calling 0303 123 1113.

Changes to this Privacy Notice

We regularly review our privacy notice and reserve the right to make changes at any time without notice.

This Notice was last updated on 29th April 2022.

