

CONFIDENTIAL

2026

PRIVACY POLICY

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DAVID BONNETT ASSOCIATES

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DBA DOCUMENTATION

Statement Issued: 12/10/2026

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Basic Information:

1. Firm Name: David Bonnett Associates
2. Registered Address: Fourth Floor, 399-401 Strand, London WC2R 0LT
3. Telephone Number: 020 7275 0065
4. Point of Contact: Mr Struan Cameron (Practice Director)

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Issue date	Draft number	Draft by	Check by	Issued to
29.09.2026	02	DBA	SC	Website

1. Privacy Policy

Introduction

David Bonnett Associates Limited (DBA, we, us or our) is an inclusive design and access consultancy. This policy explains how we collect, use, store, share and protect personal data in connection with our professional services, business contacts, recruitment, employment and website. It is intended for clients, suppliers, project participants, employees, applicants and other individuals who interact with us.

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection laws. DBA is generally the data controller for the activities described here. In some projects we may act on another organisation's instructions as a processor; the relevant contractual arrangements will apply.

What is personal data?

Personal data is information relating to an identified or identifiable living person, whether that person can be identified directly or indirectly. Examples include names, contact details, job information, correspondence and recorded opinions. Health and disability information is special category data and requires additional safeguards.

Our responsibilities and data protection principles

DBA is responsible for ensuring that its systems, working practices, staff and relevant suppliers handle personal data appropriately. Everyone working for DBA must follow our applicable privacy, confidentiality and IT procedures, undertake relevant training and report suspected data incidents promptly. Breaches may be addressed through our internal procedures.

We follow the UK GDPR principles. Personal data must be:

- processed lawfully, fairly and transparently, using an appropriate lawful basis;
- collected for specified, explicit and legitimate purposes and not used incompatibly with them;

- adequate, relevant and limited to what is necessary;
- accurate and, where needed, kept up to date;
- retained only for as long as necessary;
- protected through appropriate security measures.

We are accountable for demonstrating compliance with these principles and for applying appropriate safeguards to international transfers.

Clients, suppliers and other professional contacts

Information we collect

We may hold names, organisations, job titles, business addresses, telephone numbers, email addresses, correspondence, meeting records, event registrations and other information provided in the course of professional contact. Where relevant, we may process dietary or access requirements for events; these may reveal sensitive information and are handled with additional care.

How we collect and use it

We obtain this information directly from individuals, through referrals and introductions, business cards, professional events, correspondence, our website and publicly available professional sources. We use it to respond to enquiries, maintain working relationships, arrange meetings and events, prepare proposals, administer contracts and payments, and provide relevant professional updates where permitted by law.

Sharing

Contact information may be shared with staff, relevant service providers and professional advisers where necessary for these purposes. We do not sell personal data. Individuals can ask us to correct their contact details or stop receiving marketing communications.

Personal data used in providing inclusive design services

Information we collect

Our project records may include names, job titles, professional contact details, responsibilities, correspondence, meeting notes, consultation responses, project submissions and information recorded on shared document platforms. We may obtain business identification and due-diligence information where needed.

For stakeholder engagement and access consultation, we may collect comments, lived-experience accounts, accessibility needs and, where relevant, disability or health information. We aim to collect only the information necessary for the consultation and explain the intended use at the point of collection. Where practicable, consultation findings are anonymised or aggregated before wider circulation.

Collection and use

Information may come directly from participants, clients, design teams, consultants, project portals, public records or materials created in delivering our services. We use it to undertake access reviews, provide advice, manage projects, document design decisions, consult stakeholders, produce reports, support tenders and comply with legal or professional obligations.

Disclosure

Relevant information may be shared with the commissioning client, design and project teams, consultation partners, document-management providers and professional advisers, where justified by the work. We limit sharing to what is needed and consider confidentiality, participant expectations and any additional conditions applying to sensitive information

Our people, applicants and contractors

Information we collect

For recruitment and employment purposes we may process applications, CVs, qualifications, references, right-to-work evidence, contact and emergency details, contracts, payroll and pension records, training and performance records, expenses, absence and leave records, and information needed to manage health, safety and reasonable adjustments. This includes information relating to employees, directors, consultants, contractors, temporary workers and applicants.

Collection and use

We obtain information from individuals, referees, recruitment providers, occupational health advisers and records created during the working relationship. We use it to assess applications, administer employment and contractual arrangements, pay staff, manage training and performance, support wellbeing and workplace adjustments, meet statutory obligations and protect the practice and its people.

Disclosure

Where necessary, we share relevant information with payroll, pension, HR and IT providers, insurers, professional advisers, regulators, public authorities and clients receiving staff credentials for tenders or project delivery. More detailed information may be provided separately to employees and applicants where appropriate.

Lawful Basis for Processing

David Bonnett Associates processes personal data fairly and lawfully in accordance with UK GDPR and the Data Protection Act 2018.

We only process personal data where there is a lawful basis for doing so, including contractual obligations, legal requirements, legitimate business interests or consent where appropriate.

Where sensitive personal information, including health or disability-related data, is processed, we ensure that the appropriate legal conditions and safeguards are in place.

Security and confidentiality

We use proportionate organisational and technical measures to protect information from accidental loss, alteration, unauthorised access, disclosure or misuse. Measures may include access permissions, authentication, secure storage, appropriate transfer methods, staff guidance, confidentiality requirements and supplier controls. Access is restricted according to business need.

Our staff and consultants are expected to follow our information-handling procedures. We also expect suppliers and subconsultants handling information on our behalf to provide appropriate protection. No communication method is entirely risk-free, so we take care when transmitting sensitive material.

Service providers, disclosure and international transfers

We engage external providers to support IT, cloud storage, accounting, HR, payroll, pensions, document management, events and other business operations. Providers may process personal data only where relevant to their role, subject to appropriate arrangements. We may also disclose information where legally required or necessary to establish, exercise or defend legal claims.

Some providers or project systems may store or permit access to data outside the UK. Where a restricted transfer takes place, we use an applicable lawful mechanism, such as UK adequacy regulations, the UK International Data Transfer Agreement or an appropriate UK Addendum, together with any required assessment and safeguards.

How long we retain information

We keep personal data only for as long as reasonably necessary for the purposes described, taking account of contractual requirements, legal and tax obligations, professional recordkeeping, insurance and potential claims. Retention periods vary according to the record and its purpose. When information is no longer required, we securely delete, anonymise or dispose of it in accordance with our retention arrangements.

Your rights

Subject to applicable conditions and exemptions, individuals may have the right to:

- request access to personal data we hold about them;
- ask us to correct inaccurate or incomplete data;
- request erasure of personal data;
- request restriction of processing or object to certain processing;
- receive certain data in a portable format;
- withdraw consent at any time where processing relies on consent;
- raise concerns about certain automated decisions, where applicable.

To exercise a right, please contact us using the details below. We may ask for information to verify identity. We normally respond within one month, although the law permits extensions in certain circumstances. Some rights are not absolute.

Website and professional communications

We may receive information submitted through our website or by email and may process limited technical information needed for website operation and security. If our website uses non-essential cookies or analytics, we will provide the appropriate information and choices through our website cookie arrangements.

We may send relevant professional news or invitations where permitted by applicable marketing and privacy laws. You can ask us to stop sending marketing messages at any time.

Questions, complaints and contact details

Questions, rights requests and complaints about how DBA handles personal data should be directed to:

Struan Cameron, Director

David Bonnett Associates Limited

Registered Address: 4th Floor, 399-401 Strand, London, WC2R 0LT

Email: s.cameron@davidbonnett.co.uk

We will investigate concerns and respond as appropriate. You may also complain to the Information Commissioner's Office (ICO) at www.ico.org.uk. We encourage you to contact us first so we can try to resolve the matter.

All staff should promptly refer requests, complaints or suspected personal data breaches to the designated director or appropriate internal contact

Review of this policy

We review this policy periodically and update it when our activities, systems or legal requirements change. The latest version will be available on request.

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