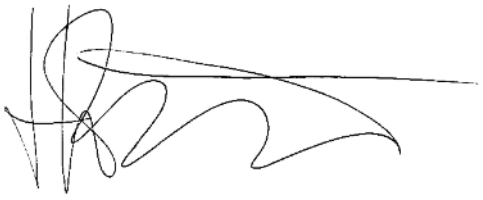
Tilhill Forestry

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Client Data Protection Policy



Harry Stevens
Managing Director
Tilhill Forestry Limited
July 2026

Tilhill Forestry

BSWGROUP member of binderholz

Client Data Protection Policy

This Policy sets out the basis on which Tilhill Forestry will process personal information belonging to our clients. The Policy sets out our practices regarding personal information and how we will use it.

Contacting us

Tilhill Forestry's appointed Data Protection Officer is our Head of Safety and Assurance, who can be contacted at **gdprenquiries@tilhill.com**.

If clients have any questions about our Policy or their information, or to exercise any of their rights as described in this Policy or under data protection laws, clients can contact us:

By post: Tilhill Forestry, Halbeath Interchange Business Park, Kingseat Road, Dunfermline, Fife KY11 8RY

By email: gdprenquiries@tilhill.com.

By telephone: +44 (0) 1383 627100

Definitions

We/Our/Us – Tilhill Forestry

You – Our Client

Data protection principles

Anyone processing personal data must comply with the principles of processing personal data as follows:

i. Lawfulness, fairness and transparency – data must be processed lawfully, fairly and in a transparent manner.

ii. Purpose limitation – data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

iii. Data minimisation – data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

iv. Accuracy – data must be accurate and, where necessary, kept up to date.

v. Storage limitation – data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

vi. Integrity and confidentiality - data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organisational measures.

This Policy describes the personal information that we collect and explains how we comply with these principles.

Information we may collect

We collect the personal information as necessary to enable us to carry out our client's instructions and to manage and operate our business, and to comply with our legal and regulatory obligations.

The personal information that we may collect includes, but is not limited to, the following:

i. name; ii. home and business address; iii. contact details (such as business and personal telephone numbers and email address); iv. date of birth; v. gender; vi. disability; vii. financial assistance; viii. marital

status; ix. copies of passport, national identity card, driving licence, utility bills, bank statements and similar documents; x. bank details; xi. immigration status and work permits; xii. other personal information contained in correspondence and documents which you may provide to us; and xiii. information we obtain from our IT and communications monitoring.

Legal basis for processing

We process personal information on the basis of one or more of the following reasons:

i. Processing is necessary for the performance of our contractual engagement with the client: this relates to all personal data we reasonably need to process to carry out the client's instructions.

ii. Processing is necessary for compliance with a legal obligation to which we are subject: for example, in relation to anti-money laundering.

iii. Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data: this relates to our processing for our legitimate marketing purposes, for our management, accounting and administration purposes and for data security.

How we use client information

We shall use personal information and any other information which we may collect for the purpose of:

i. the provision of professional services as reasonably necessary in order to carry out our client's instructions, including associated administration and accounting;

ii. marketing our services, with the exception of personal information received for compliance with anti-money laundering regulations, see also v. below;

iii. compliance with anti-money laundering requirements and any other law or regulation and the rules of any applicable governmental, regulatory authority or professional body;

iv. any dealings with any governmental, regulatory authority or professional body; and

v. where we request personal information to identify the client for compliance with anti-money laundering regulations, we shall process such information only for the purposes of preventing money laundering or terrorist financing, or as otherwise set out in this Policy or permitted by law.

Marketing

We may use personal information to notify you about important developments and services which we think clients may find valuable, for sending newsletters, blog updates, marketing brochures, invitations to events and similar marketing.

Clients can tell us if they do not wish to receive direct marketing by writing to us and/or by contacting our Marketing Team at **enquiries@tilhill.com**. It may take us up to five working days to action your request.

Clients can unsubscribe from any email newsletter or other email marketing, and can also click on the 'unsubscribe' button at the bottom of the email.

Email monitoring

Emails which clients send to us or which we send to clients may be monitored by us to ensure compliance with professional standards and our internal compliance policies. Monitoring is not continuous or routine but may be undertaken on the instruction of the Managing Director where there are reasonable grounds for doing so.

Third party processors

Our information technology systems are occasionally operated by third parties and therefore some data processing is carried out on our behalf by a third party. Details regarding these third party data processors can be obtained from our Data Protection Officer whose details are given above.

Where processing of personal data is carried out by a third party data processor on our behalf we endeavour to ensure that appropriate security measures are in place to prevent unauthorised access to or use of client's data.

Disclosure of personal information

Personal information will be retained by us and will not be shared, transferred or otherwise disclosed to any third party, save as set out in this Policy.

If we are working with other professional advisers in relation to any matter handled by us on our client's behalf then, unless our client instruct us otherwise, we shall assume that we may disclose their information to them.

We may disclose and share personal information:

i. with our Directors, employees and consultants;

ii. to other professional advisers and third parties in accordance with client's instructions;

iii. to our professional indemnity, management liability and commercial combined insurers, brokers or advisers, and auditors, lawyers or risk managers who we or they may appoint;

iv. if we, acting in good faith, consider disclosure to be required by law or the rules of any applicable governmental, regulatory or professional body.

Clients rights

Access to information and updating information

Clients have the right to access information which we hold about them. If they so request, we shall provide them with a copy of their personal information which we are processing ("subject access request").

Clients also have the right to receive their personal information in a structured and commonly used format so that it can be transferred to another data controller ("data portability").

We want to make sure that client personal information is accurate and up to date. Clients may ask us to correct or remove information they think is inaccurate.

Right to object

Clients have the right to object at any time to our processing of their personal information for direct marketing purposes.

When we process client information based on our legitimate interests

Clients also have the right to object, on grounds relating to their particular situation, at any time to processing of their personal information which is based on our legitimate interests. Where clients object on this ground, we shall no longer process their personal information unless we can demonstrate compelling legitimate grounds for the processing which override their interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Clients other rights

Clients also have the following rights under data protection laws to request that we rectify their personal information which is inaccurate or incomplete.

In certain circumstances, clients have the right to:

i. Request the erasure of their personal information ("right to be forgotten");

ii. restrict the processing of their personal information to processing to which they have given their consent.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable law apply.

Exercising of client rights

Clients can exercise any of their rights as described in this policy and under data protection laws by contacting the Data Protection Officer.

Save as described in this Policy or provided under applicable data protection laws, there is no charge to clients for the exercise of their legal rights. However, if client's requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either:

i. Charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or

ii. refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm their identity.

Security of client information

We store client information in hard copy and in electronic format. We use industry standard technical and organisational measures to protect information from the point of collection to the point of destruction. For example:

i. Hard copy information files are restricted to authorised individuals, such as Directors, Employees and any other individual authorised by Tilhill Forestry.

ii. We use, as appropriate, encryption, firewalls, access controls, policies and other procedures to protect information from unauthorised access.

iii. Where appropriate, we use pseudonymisation and/or encryption to protect client information.

iv. We will only transfer personal data to a third party if it agrees to comply with those procedures and policies, or if it puts in place adequate measures itself.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect personal information, we cannot guarantee the security of client data transmitted over the internet.

How long we keep your information

Personal information received by us will only be retained for as long as necessary to fulfil our engagement. Following the end of our engagement we will retain client information for as long as necessary and permitted for legal, regulatory, fraud and other financial crime prevention and legitimate business purposes. After this period, client personal data will be securely destroyed in accordance with our Data Retention Policy. Further details regarding our Data Retention Policy can be obtained from our Privacy Officer whose details are set out above.

Complaints

Clients should address complaints to our Data Protection Officer whose details are set out above.

In addition, you have the right to complain to the Information Commissioner's Office (https://ico.org.uk/) about our data processing activities in relation to your personal information if you think they infringe applicable data protection laws (ICO helpline on 0303 123 1113).

Changes to the policy

We may change this Policy from time to time. The current version will always be available from us in hard copy or on our website.