

CLEARPATH

Programme Management

PRIVACY POLICY

Last updated: April 2026

This Privacy Policy explains how the Provider collects, uses, stores, and protects personal data in connection with the Clearpath programme management platform. It applies to all individuals who use the Service, visit the website, or whose personal data is processed through the Service. This policy is provided in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data Use and Access Act 2025.

1. WHO WE ARE

1.1 Clearpath is a cloud-hosted programme management platform designed for UK construction subcontractors. The Service is operated by Clearpath Construction Solutions Ltd., a company registered in England and Wales and registered with the Information Commissioner's Office under registration number ZC138909 (the Provider, as defined in the Terms and Conditions of Service).

1.2 For the purposes of Data Protection Law, the Provider is the data controller in respect of personal data collected directly from users of the Service (such as account registration data and usage data). Where the Provider processes personal data uploaded by a Customer (such as project data containing names of third parties), the Customer is the data controller and the Provider is the data processor, as further described in the Data Processing Addendum.

1.3 If you have any questions about this Privacy Policy or wish to exercise your data protection rights, please contact us at: support@clearpath.build.

2. PERSONAL DATA WE COLLECT

2.1 Account registration data: When you create an account, we collect your first name, last name, email address, and job title. If you are invited by an organisation administrator, your email address is provided to us by that administrator.

2.2 Authentication data: We store a cryptographically hashed version of your password (using PBKDF2). We never store or have access to your password in plaintext.

2.3 Usage data: When you use the Service, we automatically collect your IP address, browser type and version, pages visited within the Service, timestamps of actions (such as login times, activity updates, and diary entries), and session identifiers.

2.4 Customer-uploaded data: Through the normal use of the Service, Customers and their Authorised Users may enter personal data belonging to third parties into the Service. This may include names, email addresses, and job titles of individuals associated with construction

projects (such as client representatives, main contractor personnel, or subcontractor staff). The Customer is the data controller in respect of this data.

2.5 Site diary photographs: Photographs uploaded to site diaries may contain images of individuals on construction sites. The Customer is responsible for ensuring that any individuals depicted have been appropriately informed.

2.6 Communication data: If you contact us by email, we retain the content of that correspondence for support and record-keeping purposes.

3. HOW WE USE YOUR DATA

3.1 We process personal data for the following purposes and on the following lawful bases:

(a) Providing the Service: We process account data and usage data to operate the Service, authenticate users, manage subscriptions, and deliver features such as email notifications, delay tracking, and diary management. Lawful basis: performance of a contract (Article 6(1)(b) UK GDPR).

(b) Security and fraud prevention: We process IP addresses, login timestamps, and session data to detect and prevent unauthorised access, monitor for security threats, and enforce account lockout policies. Lawful basis: legitimate interests (Article 6(1)(f) UK GDPR) — specifically, our interest in maintaining the security and integrity of the Service.

(c) Service improvement: We may analyse aggregated, anonymised usage patterns to improve the Service, fix bugs, and develop new features. Where data is fully anonymised, it is no longer personal data and Data Protection Law does not apply.

(d) Legal compliance: We may process personal data where necessary to comply with a legal obligation, respond to law enforcement requests, or establish, exercise, or defend legal claims. Lawful basis: legal obligation (Article 6(1)(c)) or legitimate interests (Article 6(1)(f)).

(e) Email notifications: We send transactional emails (password resets, account invitations) and Service-related emails (daily summaries, overdue activity alerts) using the email address you provided at registration. These are not marketing emails. Lawful basis: performance of a contract. You can disable Service-related emails in your account settings.

4. DATA SHARING AND THIRD PARTIES

4.1 We do not sell, rent, or trade personal data to third parties.

4.2 We share personal data with the following categories of service providers (sub-processors), solely for the purpose of providing the Service:

(a) Railway Corp. (United States) — cloud hosting infrastructure and PostgreSQL database hosting. All Customer Data is stored on Railway's servers.

(b) Cloudflare, Inc. (European Union) — object storage (Cloudflare R2) for photographs, delay evidence, and project images uploaded through the Service. Files are stored in Cloudflare's European Union data centres under the R2 EU jurisdiction setting.

(c) Twilio SendGrid (United States) — transactional email delivery for account invitations, password resets, daily summary emails, and overdue activity notifications.

(d) Stripe Payments Europe Ltd. (Republic of Ireland) — subscription billing and payment processing. Stripe receives the billing contact name, email address, billing address, organisation name and subscription tier. Card numbers are entered directly into Stripe's secure form and are tokenised by Stripe; the Provider does not see or store full card numbers.

4.3 Each sub-processor is bound by a data processing agreement requiring them to process personal data only on our instructions and to implement appropriate security measures. Full details are set out in Schedule 3 of the Data Processing Addendum.

4.4 Where sub-processors are located outside of the United Kingdom, we rely on Standard Contractual Clauses (as supplemented by the UK International Data Transfer Addendum) or relevant adequacy decisions to ensure appropriate safeguards for international data transfers.

4.5 We may disclose personal data to law enforcement authorities, regulators, or courts where required by law or legal process.

5. DATA RETENTION

5.1 Account data: We retain your account data for as long as your account is active and your organisation has an active subscription. Upon termination, we make Customer Data available for export for 30 days and delete it within a further 30 days, except where retention is required by law.

5.2 Usage data and server logs: IP addresses and access logs are retained for a maximum of 90 days for security monitoring purposes and then permanently deleted.

5.3 Communication data: Support correspondence is retained for 2 years after the most recent communication, then deleted.

5.4 Anonymised data: Fully anonymised, aggregated data (which cannot be used to identify any individual) may be retained indefinitely for service improvement purposes.

6. YOUR RIGHTS

6.1 Under Data Protection Law, you have the following rights in relation to your personal data:

(a) Right of access: You can request a copy of the personal data we hold about you.

(b) Right to rectification: You can ask us to correct inaccurate or incomplete personal data. You can also update your name, email, and job title directly within the Service.

(c) Right to erasure: You can ask us to delete your personal data, subject to any legal obligations we have to retain it.

(d) Right to restriction: You can ask us to restrict processing of your personal data in certain circumstances.

(e) Right to data portability: You can request that we provide your personal data in a structured, commonly used, machine-readable format.

(f) Right to object: You can object to processing based on legitimate interests. We will stop processing unless we can demonstrate compelling legitimate grounds.

(g) Right to complain: You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk if you believe we have not handled your personal data in accordance with Data Protection Law.

6.2 To exercise any of these rights, please contact us at support@clearpath.build. We will respond to your request within 30 days. In complex cases, we may extend this by a further 60 days, in which case we will inform you of the extension and the reasons for it.

7. DATA COMPLAINTS PROCEDURE

7.1 In accordance with the Data Use and Access Act 2025, we maintain a formal complaints handling procedure for data protection matters.

7.2 To submit a data protection complaint, email support@clearpath.build with the subject line "Data Protection Complaint". We will acknowledge your complaint within 30 days and provide a full response without undue delay.

7.3 If you are not satisfied with our response, you may escalate your complaint to the ICO at ico.org.uk/make-a-complaint.

8. SECURITY

8.1 We implement appropriate technical and organisational measures to protect personal data, including: encryption of data in transit using TLS; cryptographic password hashing using PBKDF2; role-based access controls; CSRF protection; Content Security Policy headers; rate limiting and account lockout; and regular security reviews. Full details are set out in Schedule 2 of the Data Processing Addendum.

9. CHILDREN'S DATA

9.1 The Service is designed for use by professionals in the construction industry and is not intended for use by individuals under the age of 18. We do not knowingly collect personal data from children.

9.2 If we become aware that we have collected personal data from an individual under 18, we will take steps to delete that data promptly.

10. CHANGES TO THIS POLICY

10.1 We may update this Privacy Policy from time to time. We will notify registered users of material changes by email not less than 30 days before the changes take effect.

10.2 The current version of this Privacy Policy is always available for download within the Service and on our website.