

SPENCER CONSTRUCTION & ENGINEERING, INC.

Privacy Policy — DRAFT for client review

Effective date: [INSERT DATE]

Last updated: [INSERT DATE]

DRAFT NOTICE: This document is a draft prepared for internal review. It is not legal advice. Bracketed items must be confirmed by Spencer Construction & Engineering, Inc. and reviewed by qualified counsel before publication.

1. Who we are

Spencer Construction & Engineering, Inc. (“Spencer C&E,” “we,” “us,” or “our”) operates the website at [www.spencercande.com] (the “Site”). We are a licensed general contracting and civil engineering firm based in Jacksonville, Florida, United States.

For the purposes of the EU and UK General Data Protection Regulation (“GDPR”), Spencer Construction & Engineering, Inc. is the data controller for personal data collected through this Site.

Contact details for privacy matters:

- Spencer Construction & Engineering, Inc.
- Jacksonville, Florida, United States [insert full mailing address]
- Email: info@spencercande.com
- Phone: 904-900-1644
- [EU/UK representative under GDPR Article 27, if required: insert name and address, or state “not applicable”]

2. Scope of this policy

This policy explains what personal data we collect through the Site, why we collect it, how we use and share it, how long we keep it, and the rights available to you. It applies to visitors to the Site, individuals who submit consultation or contact requests, and individuals who correspond with us by email or phone as a result of the Site.

It does not apply to personal data we process in our role as a contractor under a construction or engineering agreement, to job-site records, or to third-party websites we link to.

3. Personal data we collect

3.1 Information you give us

- Identity and contact data: name, company or organization, job title, email address, telephone number.
- Project inquiry data: project location, project type, budget range, timeline, and any other details you choose to include in a consultation request or message.
- Correspondence: the content of emails, form submissions, and call notes.

3.2 Information collected automatically

- Technical data: IP address, browser type and version, device type, operating system, and language settings.

- Usage data: pages viewed, time on page, referring URL, and links clicked.
- Cookie and similar technology data: see Section 8.

3.3 Special category data

We do not intentionally collect special category data (such as health, racial or ethnic origin, religious beliefs, or biometric data) through the Site. Please do not submit such information through our forms.

3.4 Children

The Site is directed to businesses and public agencies and is not intended for children under 16. We do not knowingly collect personal data from children. If you believe a child has provided us personal data, contact us and we will delete it.

4. How we use your personal data and our legal bases

Under GDPR we rely on the following legal bases:

- Performance of a contract or steps prior to entering a contract (Art. 6(1)(b)): responding to consultation requests, preparing proposals and estimates, and administering project communications.
- Legitimate interests (Art. 6(1)(f)): operating and securing the Site, understanding how the Site is used, preventing fraud and abuse, maintaining business records, and marketing our services to business contacts — balanced against your rights and freedoms.
- Consent (Art. 6(1)(a)): non-essential cookies and analytics, and any optional marketing emails. You may withdraw consent at any time without affecting prior processing.
- Legal obligation (Art. 6(1)(c)): retaining records required by tax, licensing, public procurement, and construction law.

5. Use of artificial intelligence (AI) on this website

We want to be transparent about where AI technologies are involved in this Site and in our handling of the information you send us.

5.1 AI-assisted content and site development

Portions of the written content, imagery, layout, and underlying code of this Site were produced or refined with the assistance of generative AI tools under human direction. All published content is reviewed and approved by Spencer C&E before publication. Company facts, credentials, certifications, and project descriptions are supplied and verified by Spencer C&E.

5.2 AI features that process your input

[Select the statement that applies and delete the other.]

- Option A — No AI processing of visitor data: This Site does not use chatbots, AI assistants, or automated tools that process the personal data you submit. Form submissions are delivered directly to Spencer C&E staff and reviewed by a person.
- Option B — AI features in use: This Site uses [describe feature, e.g., an AI assistant / AI-assisted inquiry summarization] provided by [vendor name]. Text you enter into that feature is transmitted to the vendor to generate a response. We instruct our vendors not to use your input to train their general-purpose models. Do not enter confidential, sensitive, or special category information into AI features.

5.3 No automated decision-making

We do not use AI or any other automated process to make decisions that produce legal effects concerning you or similarly significantly affect you, within the meaning of GDPR Article 22. Decisions about proposals, pricing, hiring, and contract award are made by our staff.

5.4 Accuracy

AI-assisted content may contain errors. Nothing on this Site constitutes an offer, a binding estimate, or professional engineering advice. Contact us directly to confirm any information before relying on it.

5.5 Your choices

You may always reach us without using any AI-supported feature by emailing info@spencercande.com or calling 904-900-1644.

6. Sharing your personal data

We do not sell your personal data. We share it only as follows:

- Service providers (processors) that host the Site, deliver email, provide analytics, or support IT security, each bound by a written data processing agreement.
- Project partners — design professionals, subcontractors, owners, or prime contractors — where necessary to respond to your inquiry or deliver a project.
- Professional advisors such as legal counsel, accountants, and insurers.
- Public authorities where required by law, court order, or a public procurement obligation.
- A successor entity in connection with a merger, acquisition, or sale of assets.

Current categories of processors: [website hosting platform], [form/email delivery provider], [analytics provider, if any], [AI vendor, if Option B above applies].

7. International transfers

We are located in the United States, and our service providers may process data in the United States or other countries outside the European Economic Area and the United Kingdom. Where we transfer personal data out of the EEA or UK, we rely on appropriate safeguards, including the European Commission's Standard Contractual Clauses together with the UK International Data Transfer Addendum where applicable, and, where relevant, the EU-U.S. Data Privacy Framework. You may request a copy of the safeguards we use by contacting us.

8. Cookies and similar technologies

We use cookies and similar technologies to operate the Site and, where you consent, to understand how it is used.

- Strictly necessary cookies: required for the Site to function and security. These are set without consent.
- Analytics and performance cookies: set only with your consent where required, and used to measure traffic and improve content.
- [Marketing/advertising cookies: state whether used; if none, say "We do not use advertising or cross-site tracking cookies."]

Where consent is required, we present a cookie banner allowing you to accept or reject non-essential cookies, and you can change your choice at any time via [cookie settings link]. You can also block or delete cookies in your browser, though parts of the Site may not work correctly.

9. Retention

We keep personal data only as long as necessary for the purposes described above:

- Consultation and contact inquiries that do not lead to a project: [24] months from last contact.
- Client and project records: for the life of the project plus the period required by contract, statute of repose, licensing, insurance, and tax requirements — typically [7–10] years.
- Website analytics data: [14–26] months.

When retention periods expire, we delete or irreversibly anonymize the data.

10. Your rights

Where GDPR applies, you have the right to:

- Access a copy of the personal data we hold about you.
- Rectify inaccurate or incomplete data.
- Erase your data (“right to be forgotten”) where no overriding basis to retain it applies.
- Restrict processing in certain circumstances.
- Data portability for data you provided under consent or contract.
- Object to processing based on legitimate interests, and to direct marketing at any time.
- Withdraw consent at any time where processing is based on consent.
- Lodge a complaint with your national supervisory authority (in the UK, the Information Commissioner’s Office).

To exercise any right, email info@spencercande.com. We respond within one month and may request proof of identity. We do not charge a fee unless a request is manifestly unfounded or excessive.

If you are a resident of California or another U.S. state with a comprehensive privacy law, you may have comparable rights to access, delete, correct, and opt out of the sale or sharing of personal information. We do not sell or share personal information for cross-context behavioral advertising.

11. Security

We maintain administrative, technical, and physical safeguards appropriate to the risk, including encryption in transit (HTTPS), access controls, and vendor due diligence. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. If a personal data breach is likely to result in a risk to your rights, we will notify the relevant supervisory authority within 72 hours and affected individuals where required.

12. Third-party links

The Site may link to third-party websites, documents, or agency portals. We are not responsible for their privacy practices, and we encourage you to read their policies.

13. Changes to this policy

We may update this policy from time to time. The “last updated” date above reflects the most recent revision. Material changes will be highlighted on the Site, and where required we will seek renewed consent.

14. Contact

Questions, requests, or complaints about this policy or our handling of personal data:

- Email: info@spencercande.com
- Phone: 904-900-1644
- Mail: Spencer Construction & Engineering, Inc., [full mailing address], Jacksonville, FL
- [Data protection contact / DPO, if appointed: insert name and email]

Reviewer checklist before publishing

- Confirm full legal entity name, mailing address, and effective date.
- Choose Option A or Option B in Section 5.2 and delete the other.
- List actual hosting, email, analytics, and AI vendors in Section 6.
- Confirm cookie categories in use and enable a consent banner if non-essential cookies are set.
- Confirm retention periods with counsel and insurer.
- Determine whether an Article 27 EU/UK representative is required.
- Have qualified legal counsel review the final text.