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General provisions

- a) Our policy and procedures conform to the requirements of the General Data Protection Regulation (GDPR) / Data Protection Act 2018.
- b) This policy applies to all personal data processed by the Company.
- c) The Data Controller shall take responsibility for the Company's ongoing compliance with this policy.

S&R Construction gather and process your personal information in accordance with this policy and in compliance with the relevant data protection regulation and laws. This policy provides you with necessary information regarding your rights and obligations and explains how, why and when we process your personal data.

S&R Constructions registered office is at Leys Road, Brierley Hill, DY5 3UP and we're a registered company in England under company number 3653041 we act as the data controller when processing data. We are committed to handling & processing personal data in a fair, reasonable and transparent manner. Our designated Data Protection Officer is Jamie Sankey who can be contacted at Leys Road, Brierley Hill, DY5 3UP.

The personal data that we collect from our business activities is listed as following:

- Full Name
- Date of Birth
- Home Address
- Personal Details
- Contact numbers
- Financial Details
- Business email
- Training & Accreditations
- Location Information

We collect information in the following ways:

- Registration forms
- Online Registration forms
- Pre-Qualification Questionnaire

To ensure data remains secure with our main purpose to protect interests of:

- Customers
- Employees
- Stakeholders



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Issue No.:

Why do we collect data

Contact names and emails shall be held for relevant individuals required for the completion and support of contracts between a customer and S&R Construction Ltd. Contact data may be shared with relevant parties involved in the completion of a contract where they require direct contact but only if the recipient of the data is also GDPR compliant.

The data shall be held until the supply and support of a contract is complete, all data processed must be in accordance with our legal, contractual and statutory obligations and to provide you with our products and services. The purpose and reasons for processing are:

- Contact data may be shared with relevant parties involved in the completion of a contract where they require direct contact but only where the recipient of the data is also GDPR compliant.
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes.

Data security when storing, handling and processing

Do not under any circumstances transfer your password to anyone other than Managing Director or Network Administrator, if voice recognition can be confirmed. it is recommended all employees set a memorable password which is a minimum 8 characters including (1 upper case letter, 1 special character, 1 number & lowercase letters).

It is the responsibility of our employees, as far as practicable to store and share data reasonably, data subject folders under the domain are regularly checked (at least once weekly) for anomalies. Email accounts should be actively monitored for 3rd Party or Spam Communications if you are unsure of the sender's identity or need for requesting information you shall inform line management.

The organisation's computer system is regularly backed up with a copy remotely stored by our IT and Network management company. The integrity of the computer system and the data held on it is maintained by running background virus protection software and the maintenance of effective and regularly updated web root firewalls.

Roles & responsibilities of the data controller

S&R Construction Ltd holds a responsibility to process information in a manner which consists of:

• Integrity & confidentiality – Ensure staff are aware of what personal data is required and that data is processed in a way to ensure appropriate security of the personal data, including protection against unauthorised or unlawful processing which may



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include accidental loss, destruction or damage, using appropriate technical or organisational measures.

- **Storage limitation** Should be limited for the purpose for which personal data has been processed, records shall be safely disposed of when no longer required by method of transfer to archiving system.
- Lawfulness, fairness & transparency- It's not only data in transition which shall be • handled securely but data at rest, it's essential to be clear on how the data will be used, shared and for how long.
- **Purpose Limitation**- Will only process the data in accordance to the purpose outlined when consent was given.
- Accuracy- Data subjects have a right to request for access to data, in need of an update or rectification, it's important that you understand the data you hold before sharing and limit the use of Personally identifying information where possible.
- Data Minimisation Consider the use of data minimising techniques by archiving • folders which are no longer in use and where applicable shortening techniques such as pseudonymisation and anonymisation; to alter or remove personally identifiable field by shortening words or the use of acronyms or abbreviations.

Employees have a right to access any personal information such as:

What data we store about you The need for processing The categories of data concerned The recipients to whom the personal data will be disclosed How long we intend to hold data for If we didn't collect the data directly from you- information about the source

Data subjects have a right to request erasure of personal data to restrict processing (where applicable) in accordance with data protection laws.

An individual may be *directly identified* from their name, address, postcode, telephone number, photograph or image, or some other unique personal characteristic.

Consequences of not sharing data

You are not obligated to provide your personal information to S&R Construction however where this information is required for us to provide you with our services, we may not be able to provide you with services without it.



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Issue No.:

How long we keep data?

S&R Construction only ever retains personal information for as long as required and we operate strict review and retention policies to meet these obligations, we are required under UK Tax law to keep your basic information (name, address, contact details) for a minimum of 6 years after which time it will be destroyed. Following the completion of the contract we will keep such data until you notify us otherwise and/or withdraw your consent.

Lodging a complaint?

S&R Construction only processes your personal information in compliance with relevant data protection laws. If you wish to raise a compliant you have a right to raise a complaint with the supervisory authority.

Jamie Sankey S&R Construction LTD Leys Road, Brierley Hill DY5 3UP

This policy and associated procedures will be formally reviewed annually, although on exception, changes may be implemented at other times as required by legislative and work practice changes.

Signed:

SJ Sanker

Title: Managing Director

Name: S. Sankey

Date: 08/02/2024