

Personal data is information relating to an identifiable living individual. Whenever personal data is processed, collected, recorded, stored or disposed of it must be done within the terms of the Data Protection Act (DPA).

As a normal part of our activities we have to keep personal data, the data we collect is limited to data relating to employees, and data relating to the contracts we undertake (our customers, suppliers, and other persons involved in our projects such as designers, tenants, sub-contractors etc). This data must be held in accordance with the requirements of the Data Protection Act.

This policy currently accounts for 1998 legislation, with some changes already made in anticipation of the GDPR 25 May 2018 regulations. We will continue to update this policy up to 25 May 2018 to ensure we are fully compliant when the new regulations come into force.

When requesting data we will ensure we are compliant with the Data Protection Act 1998 / 2018, and we undertake the following principles:

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained only for necessary and lawful purposes and shall not be further processed in any manner incompatible with that purpose.
3. Where we want to process your data for a reason not falling under a necessary and lawful purpose, we will seek your consent for the processing of your data.
4. Personal data shall be adequate, relevant and not excessive.
5. Personal data shall be accurate and, where necessary and appropriate, kept up to date.
6. Personal data processed for any purpose shall not be kept for longer than is necessary.
7. We shall take appropriate measures against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of, or damage to, personal data.
8. Individuals have the right to be informed about the collection and use of their personal data and so we will provide details of why we are collecting the data, how long we need to keep it, and who we will share it with. This information will be given to you (the individual) when we ask you for the personal data.
9. If we change the use of your personal data we will let you know beforehand.
10. Where we employ an external HR advisor who has access to your details, we will inform you.

Whilst we will apply the same principals to all data, we have defined procedures on how we deal with the data according to the reason we need to have / use it.

We will therefore identify:

- What we need the data for
- What data we actually need
- How we will use it
- How we will keep it safe
- Who it needs to be shared with
- How long we must keep it
- How we will destroy it once it is no longer lawful or necessary to keep it

Rights:

In collecting and processing data, we will consider and comply with the following individual rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

Subject Access Request (SAR)

Employees:

All employees are entitled to ask for, in writing, what information on them the company holds, and ask to see it (subject access request).

The Management (or any other nominated 'Data Controller') will usually provide the information without delay and in any case within 28 days. If the request or data is complex and we cannot do this within that timescale then we will advise you in writing as to the reason for the delay and provide the information not later than a further 2 months in duration.

You (the employee) may challenge the accuracy of the information and also update information where it is found to be incorrect.

We will not usually charge you for any information, however we may charge a "reasonable fee" based on the actual administrative cost of providing you with the information where your request is 'manifestly unfounded, excessive or repetitive'.

Other Individuals

Customers and other non-employees also have the right under the Act to know what personal data the company holds on them, we will provide this information under the same terms as we do for employees.

Responsibilities:

Employees:

All employees should make sure that the personal information they provide is accurate and inform the company when it changes. Where employees collect, process or use personal information about other people (for example customers) they must follow these guidelines:

- a) Our procedures must be followed
- b) Proposals to collect or use personal data in a new way should always be discussed with management before proceeding.
- b) Any personal data that they hold is kept securely i.e. so that access is restricted to those authorised and is protected from loss or damage - this means by physical means such as a locked office or filing cabinet and by electronic means such as computer passwords and access systems.
- c) Personal information must not be disclosed to any unauthorised third party. Great care must be taken not to discuss such information face-to-face or over the telephone nor to disclose information in writing or in other ways such as via e-mail.
- d) Personal information should be collected or used with the approval of the subject. In many cases this is obtained through general consent but in the case of sensitive data such as information concerning health or race, express consent must be obtained to use the data. Note: The company may use such information to monitor its Equal Opportunities Policy.