

Data Protection Policy

Policy and Principles

This Data Protection Policy is in place to ensure that BF Brickwork complies with the General Data Protection Regulation (GDPR) Legislation and protects the rights of employees and clients' Personal Data. The UK government has committed to implementing the GDPR irrespective of Brexit and has a new Data Protection Act 2018 (DPA) in line with the new rules and additional changes. This policy will detail information on what data Bf Brickwork hold and how the data is handled, both internally and externally. DPA is in place to ensure that personal information, is collected, used fairly, stored correctly and not disclosed unlawfully therefore must be applied to employees and external clients in which data is held electronically or within other sources.

BF Brickwork is committed to demonstrating that any personal data handled is underpinned by the 6 following principles:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date where necessary
- Kept for no longer than is necessary where data subjects are identifiable
- Processed securely and protected against accidental loss, destruction or damage.

Roles & Responsibilities

All employees of BF Brickwork must ensure that the data is handled lawfully and in line with this policy. BF Brickwork will be the 'data controller' under the terms of the legislation and is ultimately responsible for controlling the use and processing of the personal data. Due to our business capacity we are not required to assign a Data Protection Office (DPO), however the Managing Director is the intended responsible person for Data Protection at BF Brickwork. Individuals who provide personal data to BF Brickwork are responsible for ensuring that the information is accurate and up-to-date.

Data Storage

BF Brickwork is committed to ensuring that Personal data is processed lawfully and shall not be kept for longer than is necessary for that purpose or those purposes as set out in the 5th principle of GDPR.

We are committed to reviewing the length of time data is stored and will securely delete information that is no longer needed through retaining different categories of personal data and basing on individual business needs, ensuring to update, archive or securely delete information if it goes out of date.

All employees of BF Brickwork are responsible for Data Storage across the following:

- Email accounts
- Backup storage
- Paper files.

BF Brickwork must adhere to security measures e.g. ensuring that hard copy personal data is kept in lockable filing cabinet with controlled access and electronic data is kept in password protected folders. BF Brickwork will ensure that Data is stored with access to relevant persons only of which have a lawful duty to access the information.

Data Use

BF Brickwork is required to process certain Personal and Sensitive Data of employees, clients and other individuals with whom it has a relationship for legitimate business purposes and also to protect an individual's vital interest such as, but not limited to:

- Recruitment
- Payroll
- Invoicing
- Procurement
- Legal obligations – DBS, Insurance
- Pension
- Health emergency
- Employment protection.

Employees and other Data Subjects BF Brickwork including have the right to the following under the legislation:-

- Be informed of the Personal Data BF Brickwork holds about them I.E Bank Details, National Insurance Number and the legitimate reason and to any third parties to whom this may be disclosed.
- Right to prevent processing likely to cause damage or distress.
- Right to object to processing for purposes of direct marketing.
- Right to restrict processing of data.
- Right to rectification of data if inaccurate or incomplete.
- Sue for compensation if they suffer damage by any contravention of the legislation.
- Right to be forgotten.
- Right to Subject access requests.

Bf Brickwork will ensure that any forms used to gather data on an individual will explain the use of that data, how the data may be disclosed and also indicate whether or not the individual needs to consent to the processing.

Although it is not necessary to gain consent from individuals before processing their data in all circumstances, Bf Brickwork will put in place safeguards on confidentiality and ensure that data is collected is processed lawfully, fairly and transparently for specified, explicit and legitimate purposes.

BF Brickwork will ensure consent is gained when collecting certain data as defined by the legislation.

All employees and data subjects are responsible for ensuring that any personal data held is kept securely and not disclosed to any unauthorized third parties unless for lawful purposes I.e. Insurance purposes of which must be confirmed with the Director before data is shared.

Subject Access Rights (SARs)

BF Brickwork is committed to ensuring individuals have the right to access any personal data relating to them which are held.

Any individual wishing to contact BF Brickwork requesting a subject access request should address to the Data Controller and report to Director. Under the terms of the legislation, any such requests must be complied with within 40 days.

Right To Be Forgotten

BF Brickwork will ensure that upon commencement of employment, employees are made aware of the right to be forgotten for employment and recruitment purposes.

BF Brickwork is committed to ensuring the data subject has the right to obtain from them as the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based according to point and where there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing.
- the personal data have been unlawfully processed; Any individual wishing to contact BF Brickwork requesting the right to be forgotten or erasure request should address to the Data Controller and report to Director.

Providing Information

This policy will be updated as necessary to reflect best practice or future amendments made to the General Data Protection Regulation (GDPR) May 2018 and Data Protection Act 1998.

Further information and detailed guidance on a range of topics including individuals' rights, exemptions from the Act, dealing with subject access requests, how to handle requests from Third Parties for personal data to be disclosed etc. can be found on the ICO's website (www.ico.gov.uk), in particular, the Guide to Data Protection which is available from the website.

B Foster

A handwritten signature in blue ink, appearing to be 'B Foster', written in a cursive style.

Director.