



Subject: Data Protection

Policy Number: 1.9

DATA PROTECTION POLICY

Introduction

This policy sets out the obligations of Dalrymple Construction Ltd regarding data protection and the rights of employees, customers and business contacts in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (GDPR).

Dalrymple Construction Ltd require to store and use certain information about individuals, ie. employees and business contacts. This policy describes how personal data is collected, handled and stored in accordance with the GDPR and to comply with the law.

Data Protection Law

This policy aims to ensure compliance with the GDPR. The GDPR sets out the principles with which any party collects, handles, processes and stores personal data. These rules apply to data stored electronically or in paper format or any other media. To comply with the law, personal data must be collected and used fairly, stored safely and not disclosed unlawfully.

Data Subjects

This policy applies to all data the company retains relating to identifiable individuals. The data subject has rights under the GDPR, including ~

- 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.

Responsibilities

All employees who work with Dalrymple Construction Ltd have a responsibility in ensuring data is collected, processed and stored appropriately. Employees who process personal data must ensure it is handled and processed in line with this policy and the GDPR. Sheila Collins is the 'Data Controller' for Dalrymple Construction Ltd. All other employees are 'Data Processors'. Any access requests should be made in writing to the Data Controller.



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Personal Data Collected, Processed and Retained

Personal data can be collected from various sources, eg.

CVs
Employment Forms
Timesheets
Medical documents you provide to us
Medical Practitioners*
When you talk to us on the phone or in the workplace
Training Records
Fleet Management
Business Contacts

**we may ask an employee's GP or other medical professional to send us a report. We will only do this if we get the employee's consent first.*

This data can be in paper format or digital format or any other media.

Types of Personal Data

Personal information (eg. such as name, address, date of birth, NI No., driving licence no., bank details, relevant medical information, eg. such as required 'in case of emergency')

Business contact information (eg. name, address, telephone nos., e-mail address)

Characteristics information (eg. gender and age)

Contract information (eg. start dates, hours worked, grade and wage information, disciplinary action)

Work absence information (eg. number of absences and reasons, accidents)

Qualifications (eg. CV and training certificates)

Purpose of Data

We require to collect, process and retain data for the following reasons:

To fulfil a contract
Legal Duty
Legitimate Interest
Public Task
Consent
Vital Interest (*ie. where it is necessary to protect an interest which is essential for life*)



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Data Storage

Data is stored digitally and on paper format. When data is stored on paper format, it should be kept in a secure place where unauthorised people cannot see or access it. When not required employees' personal data should be kept in the locked filing cabinets within the admin/accounts office. Paper data should be shredded when no longer required. When data is stored electronically it must be protected from unauthorised access and malicious hacking attempts. Data should be held in as few places as necessary.

Data Use

Dalrymple Construction Ltd shall ensure no personal data is shared informally and if a request is made by another party for access to any personal data to which they do not have authorisation to access, then this should be formally requested from the Data Controller.

No personal data may be transferred to any other party without the authorisation of the Data Controller.

Personal data must be handled with care at all times and should not be left unattended or on view to any unauthorised parties at any time.

Dalrymple Construction Ltd do not use employees' personal data for marketing purposes.

Data Accuracy

Dalrymple Construction Ltd shall take appropriate steps to ensure all personal data held is current and accurate. This includes the rectification of personal data at the request of a data subject. If personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken to amend or erase that data, if appropriate, and in line with our reasons to use personal data.

Data Retention

Dalrymple Construction Ltd shall not keep personal data for any longer than is necessary in light of the reason or reasons for which that data was originally collected, processed and retained. Once personal data is no longer required, all reasonable steps will be taken to amend, destroy or erase the data, as appropriate. Upon leaving our employment, employees have the right to request that their data is deleted. Any request should be made formally, in writing, to the Data Controller. The request will be processed in accordance with our Data Protection Policy and Privacy Notices. We also reserve the right to retain data due to the possibility it may be required to defend a future claim against us.



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Data Subject Access Requests

Any requests should be made formally, in writing, to the Data Controller. In certain circumstances, the GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Data Breach Notification

All personal data breaches must be reported immediately to the Data Controller.

Approved by *G Anderson*

Date *17 August 2018*

Director