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1. What is the purpose of this document

This Data Protection Policy Statement sets out how SDC Builders Ltd handles Personal Information in accordance with General Data Protection Regulation ((EU) 2016/679) and the Data Protection Act 2018.

It provides information on what information we collect; what we do with that information; who we may share it with and why; and the choices and rights of individuals in respect of the information in our control. This Statement applies to SDC Builders Ltd and its divisions:

Bedford Plant Hire
Limegrove Supplies
Bedford Garage Services

and its associated Companies:

The SDC EBT Ltd
SDC Holdings Ltd
SDC Anglia Ltd
SDC Properties Ltd

This Data Protection Policy Statement applies to all Personal Information we process regardless of the medium through which it is collected or stored or whether it relates to past or present customers, clients or supplier contacts, shareholders, website users or any other Data Subject

SDC Builders Ltd keep our Data Protection Policy Statement under regular review. The latest version is available on our website: www.sdc.co.uk.

2. What data does this Statement relate to

Data Subject: Any person whose personal data is being collected, held or processed.

Personal Data: any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Sensitive Personal Data and Pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

Sensitive Personal Data: information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

3. What personal information do we collect

The information we may collect, store and use includes:

- Personal contact details such as name, title, address, email addresses, telephone numbers date of birth, gender, marital status and dependants contact details
- Nationality and residency / immigration status
- Next of kin and emergency contact persons
- Qualifications and training records
- Identification documents, for example driving licence or passport
- Employment history, references and associated information
- Bank account details
- Location of employment or workplace
- Performance information
- National Insurance Number
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means such as swipe cards and digital images.
- Incident and accident information which the individual may be involved with.

We may also collect, store and use the following categories of Sensitive Personal Data:

- Information about race, ethnic origin, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Information about health, including medical conditions and health and sickness records
- Information about criminal convictions and offences
- Drug and alcohol testing data
- Biometric and genetic data

4. How is personal information collected

We only collect personal information where there is a lawful basis to do so and that information is relevant and necessary for the effective management and development of our business or to ensure compliance with our legal and regulatory requirements.

Primarily we will collect this information from the data subject directly but in some circumstances, where that is impractical, we may collect it from third parties and other publicly available sources.

The collection of sensitive personal information will only take place where we have a lawful basis to do so and with the prior consent and knowledge of the data subject or if the law requires us to collect it.

The routes we collect personal information include:

- during our relationships with clients, consultants, contractors, subcontractors, sole traders, partnerships, individuals, suppliers and third party service providers
- through the recruitment, hiring and engagement process of agency and contract staff
- when enrolling or participating in a training course
- when registering for one of our events
- when recorded accessing one of our premises and sites through an access control system or in a manual register
- when completing an induction process
- from monitoring and surveillance systems including CCTV
- from drug and alcohol testing procedures
- from health and wellbeing monitoring processes
- from dealings with government agencies
- through the hiring and sale of plant equipment and tools
- from social media and websites or registering an enquiry through the company website
- through third party companies providing for example credit reference and background checks
- from incident and accident investigations
- when registering a vehicle for mechanical repairs
- through the sales process of building supplies materials
- through submissions of Health and Safety documentation

5. Why do we collect personal information

We collect personal information in order to manage, operate and administer our business activities and to comply with our legal obligations. These include:

- making recruitment and administrative management decisions for agency and contract staff
- to facilitate activities associated with ensuring compliance to Health and Safety Regulations across our sites, premises and workforce
- to maintain effective access and security controls for our sites and premises
- for managing and processing claims, disputes and litigations arising from our business operations
- for compliance with our legal and regulatory requirements, our policies and contractual obligations
- for accident, incident, complaint or allegation investigations and where required regulatory reporting
- to facilitate reservations and logistics planning for training events and courses
- for the management of our fleet vehicles, plant equipment, tools and other operational assets
- for processing bookings for mechanical repairs to vehicles
- for processing and fulfilling requests and orders for building supply materials
- for obtaining credit references and undertaking due diligence on individuals and representatives of companies
- for recording and maintaining databases of client, contractor and supplier relationships
- for the prevention of fraud and other illegal or inappropriate activities
- for undertaking routine business processing functions with group companies, clients, consultants, contractors, subcontractors, service providers and other third parties
- for responding to enquiries through all media channels including the Company website
- for constructing tenders, bids and proposals for submission to clients and potential clients for the provision of works and services
- for the marketing of our commercial services

6. How we commit to use personal information

We use the personal information we collect to conduct our business in an efficient, effective, responsible and lawful manner. We will only use personal information when the law allows us to. Most commonly, we will use personal information in the following circumstances:

- a) Where consent has been given.
- b) Where we need to perform the contract we have entered into with the data subject.
- c) Where we need to comply with a legal obligation.
- d) Where it is necessary for our legitimate interests (or those of a third party) and the interests and fundamental rights of the data subject do not override those interests.
- e) We may also use personal information in the following situations, which are likely to be rare:
 - a. Where we need to protect the interests of the data subject (or someone else's interests).
 - b. Where it is needed in the public interest or for official purposes.

We will only use personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use personal information for an unrelated purpose, we will notify the data subject and we will explain the legal basis which allows us to do so.

We will only use or disclose sensitive data where it is reasonably necessary in the operation of our business and we have consent to do so or it is permitted or required by law.

7. Who we may share information with

In some circumstances we may share or disclose information with third parties, including third-party service providers and other entities in the group for the purposes for which it was originally collected, where consent has been provided or where we are required or permitted by law to do so.

These third parties include:

- specified person or organisation in response to a request made by the data subject
- our related companies, business partners, contractors, subcontractors, suppliers, consultants, clients and service providers for the purpose of our business operations.
- Government agencies and regulators as required and permitted by law.
- credit reference agencies

We require any third party with whom we share information to take appropriate security measures to protect personal information in accordance with our policies. We do not allow the third party to use personal data for their own purposes. We only permit them to process personal data for the specified purposes.

8. Where information is processed

Information is processed in the UK and European Economic Area (EEA). In the unlikely event of the information being processed outside of the EEA we take additional steps to ensure that the information is protected to at least the equivalent level as would be applied by UK and EEA data privacy legislation.

9. How we protect information

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify the data subject and any applicable regulator of a suspected breach where we are legally required to do so.

10. How long will we use information for

We will only retain personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise personal information so that it can no longer be associated with an individual, in which case we may use such information without further notice to the data subject.

11. How we approach Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified the data subject of the decision and given them 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with the data subject and appropriate measures are in place to safeguard the rights of the data subject.
3. In limited circumstances, with explicit written consent from the data subject and where appropriate measures are in place to safeguard the rights of the data subject.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard the rights of the data subject.

The data subject will not be subject to decisions that will have a significant impact on them based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified them.

We do not envisage that any decisions will be taken using automated means.

12. Rights in connection with personal information

Under certain circumstances, by law all data subjects have the right to:

- **Request access** to their personal information (commonly known as a "data subject access request"). This enables them to receive a copy of the personal information we hold about them and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about them. This enables them to have any incomplete or inaccurate information we hold corrected.
- **Request erasure** of their personal information. This enables data subjects to ask us to delete or remove personal information where there is no good reason for us continuing to process it. They also have the right to ask us to delete or remove their personal information where they have exercised their right to object to processing (see below).
- **Object to processing** of their personal information where we are relying on a legitimate interest (or those of a third party) and there is something about their particular situation which makes them want to object to processing on this ground. Data subjects also have the right to object where we are processing their personal information for direct marketing purposes.
- **Request the restriction** of processing of their personal information. This enables data subjects to ask us to suspend the processing of personal information about them, for example if they want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of their personal information to another party.

If a data subject wants to review, verify, correct or request erasure of their personal information, object to the processing of their personal data, or request that we transfer a copy of their personal information to another party, they can write to us using the contact details at the end of this Statement.



DATA PROTECTION POLICY STATEMENT

No fee usually required

Data subjects will not have to pay a fee to access their personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if the request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from the Data Subject

We may need to request specific information from the data subject to help us confirm their identity and ensure their right to access the information (or to exercise any of their other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. How to contact us

If there are any questions about our Privacy Policy or the information we collect or use please contact:

FAO Data Privacy Compliance
SDC Builders Ltd
Limegrove House
Caxton Road
Bedford
MK41 0QQ
Email: dataprivacy@sdc.co.uk

Signed:

Francis Shiner
Chairman

Signed:

Adam Knaggs
Managing Director

Signed:

Martin Lowndes
Group Finance Director

Signed:

Gary Wykes
Director

Signed:

Dan Changer
Director

Signed:

Andrew Shiner
Director

Signed:

Carl Bennett
Director

Signed:

Andrew Mitchell
Finance Director

Date: **March 2023**

Next Review Date: **March 2024**