



Data Protection and GDPR Policy

Sheriff Construction Ltd

Sheriff Construction is a specialist brickwork and flat-roofing contractor, operating within the commercial and domestic marketplace.

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The Company recognises and adheres to the legal requirements and principles of the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) 2018. In doing so, Sheriff is committed to safeguarding the rights of individuals in relation to the handling of their personal data and protecting against the unlawful processing and/or storage of personal data.

In the course of our work, as a contractor and employer, the Company collects, uses and retains some records of personal data, primarily relating to employees, subcontractors, customers and suppliers.

Sheriff uses such information to carry out its essential duties as a construction business. This includes (but is not limited to) maintaining our HR, payroll and pensions, managing our accounting systems, project management, providing quotations and other business documentation, enabling email/ telephone communications, and monitoring employee/ subcontractor/ supplier performance. Website/ social media analytics are also used to monitor online visits (but not in a way that identifies individuals).

Types of data held by the company

The following non-exhaustive list below sets out examples of data which may be held in Sheriff's filing systems (physical, digital and cloud-based):

- Name, address, and other contact details
- Date of birth
- CVs, application forms, interview notes, test results, education and training records.
- Employment contract(s) and amendments
- Appraisals and performance information
- Employee records (accident, sickness, attendance)
- References
- Driving Licence information
- Medical information
- Next of kin contact details
- Immigration / right to work information (including passport information)
- Images (e.g. ID cards, photos, CCTV)
- Bank account details
- Moneys received or issued to individuals/ companies (including deductions)

Data rules

The general rules for Sheriff are:

- We only hold data for customers, suppliers and employees that have given us their information to do so.
- Personal data must be kept secure to prevent accidental loss or damage and to prevent unauthorised access or changes to data contained.
- Personal data in electronic form must be inaccessible when left unattended, for example, computers and wireless devices must be screen-locked and password protected. Line managers and supervisors have the responsibility for ensuring that their staff are aware of the restrictions for accessing personal data within their business area.
- Sheriff uses Sage as its accountancy software and for payroll. Sage is primarily designed to hold the data Sheriff needs to perform certain duties and is secured by a password.
- Sensitive personal data must not be collected/ held unless this is necessary for legitimate business purposes AND the individual has explicitly consented. **Sensitive personal data** relates to information concerning an individual's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences.
- All personal data must not be kept for a period any longer than necessary for purpose. In most cases, to meet our legal requirements, data is kept for a period of 6 years from the end of the last financial year the data relates to.
- Following a legitimate request, individuals can access personal data held by Sheriff about them.

Consent

Through agreeing to this policy you are consenting to Sheriff processing your personal data for the purposes outlined. You can withdraw your consent at any time by emailing: info@sheriffconstruction.co.uk. Please be aware that, by doing so, you may be restricting the ways in which Sheriff can communicate or carry out its business with you.

Retention

Sheriff Construction will process personal data during any contract of business with you and will continue to store only the personal data needed for a period of six years after the end of the financial year in which the contract/ business relates to. After six years any personal data may be deleted.

Security

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out testing to identify ways to further strengthen security. Sheriff uses only password protected software and all staff sign agreement to company policies as part of their induction.

Data sharing

In order to carry out the day-to-day operations our business, Sheriff may occasionally need to share your information with third parties. This will only be done in the following circumstances:

- Where the sharing of information is required for legal purposes (e.g. with HMRC for taxation issues).
- Where the sharing of information allows for pre-agreed arrangements to be conducted (e.g. with pension companies where employees have signed up to the workplace pension).
- Where the sharing of information is vital for our work to take place without disruption or delay (e.g. sharing contractor's information with subcontractors who need site delivery and contact details).

In all cases, we treat data with utmost care and take appropriate steps to protect it.

Your rights as a data subject

At any point whilst Sheriff Construction is in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access- you have the right to request a copy of the information that we hold about you.
- Right of rectification- you have a right to correct data that we hold about you is incorrect or inaccurate.
- Right to be forgotten- in certain circumstances you can ask for the data we hold about you to be erased from our records.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by you have the right to complain to:

Sheriff Construction Ltd
61b Runfold Avenue
Luton
LU3 2EJ

Telephone: 01582 591908 or email: info@sheriffconstruction.co.uk

If you do not get a response within 30 days, you can complain to the Data Protection Regulator.
Information Commissioners Office - Telephone: 0303 123 1113

Monitoring, review and communications

Sheriff Construction Ltd will review this policy on an annual basis, taking account of any changes within legislation and our organisation, and other factors.

We will communicate this policy to all our employees and ensure that they are given appropriate training where necessary.

Sheriff Construction Ltd will make this policy available when requested to interested parties including members of the public.

Policy Approval

This policy is fully supported by senior management and forms an integral part of the business strategy.



Ekrem Mahmutaj
Director

25/10/2018
Date