

Employee / Subcontractor Privacy Policy

General Data Protection Regulations (GDPR) replaces the dated Data Protection Act currently operated by the ICO and must have been implemented by all registered companies by 25 May 2018.

Personal data is data from which a living person can be identified, being an individual's name with any other piece of information.

How does the GDPR effect you?

In essence this means we must draw up new policies and procedures to ensure we meet the new legislation which specifically relates to personal individual information. We must be able to demonstrate how and where we hold this and how we use it.

As an employee or sub-contractor, much of the information we hold will have been provided by you over the years, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees. The company needs such data as an Employer and this is retained on file either in paper or digital formats.

The sort of information we hold may include your application form and references, your contract of employment and any amendments to it; correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

In our recent Audit the 'type of information' held in relation to employees and sub-contractors is as follows:

- Name and Address
- Next of Kin, including Contact Details
- Contact telephone numbers
- National Insurance Number
- Salary Information
- Bank Account Details
- Passport Details / Biometric Residents cards / Visas (to shown right to work in the UK)
- Driving licence Details
- Pension Beneficiary Information
- Qualifications and training records
- Absence and Sickness records which could include reasons for absence and GP reports / notes

This information is held on an individual basis for management and administrative use only and is only shared with companies providing a specific service to our/your requirements.

These include, but are not limited to the following:

- External Payroll Administrators
- External consultancies for which we seek advice on legitimate business matters
- Current Pension Providers (Inc our retained Financial Advisors)
- Private Medical Providers
- CITB
- Banks
- Home Office
- External training providers
- Occupational Health provider
- Trade unions

We have consulted with the above to ensure our systems and procedures meet all GDPR legislative requirements, their response will remain on file as part of our in-house policy and procedures.

We will keep and use your data to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and for 3 years after you have left. This includes using information to enable us to comply with the employment or sub-contractor contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

We may transfer information about you to other areas of the group for purposes connected with your employment or the management of the company's business.

Your personal data will be stored in line with our internal data retention policy. Whenever we collect or process your data, we will only keep it for as long as necessary and for the purpose it was collected.

If in the future we intend to process your personal data for a purpose other than that which it was collected we will seek your permission.

Your rights:

Under the General Data Protection Regulation (GDPR) you have a number of rights with regard to your personal data. You have the right to:

- Access your files
- Rectification if the data held is incorrect
- Erasure of your personal data, in accordance with the lawful retention periods
- The right to restrict processing object to processing as well as in certain circumstances the Right to data portability.

If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR with regard to your personal data.

How this effects your job role:

As a company we have additional responsibilities to consider in relation to our customers and our means of communication. We will deal this in a separate document but suffice to say there are potential implications and it is essential any personal individual data relating to customers is only used in communication between ourselves and that particular contact on a business to business basis.

Inquiries or Concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact the office of our Data Protection Lead by e-mail Aturner@jcoffey.com who will endeavour to answer your questions and advise you of any steps taken to address the issues raised by you.

If you are unsatisfied with our response, you are entitled to make a written submission to the Information Commissioners' Office.

This policy applies to all employees and other personnel engaged in J Coffey Construction operations:

Signed: E. Barrett (Original Signed)

Date: 23.11.2022

Eddie Barrett

Group Managing Director

On behalf of J. Coffey Construction