

## Subcontractor Privacy Policy

The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government. Personal data is data from which a living person can be identified, being an individual's name with any other piece of information.

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'.

They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

### How does the GDPR effect you?

This means we must ensure we adhere to this 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 a sub-contractor, much of the information we hold will have been provided by you.

The sort of information we hold may include your contract for services and any amendments to it; correspondence with or about you, at your request; information needed for payroll, contact and emergency contact details; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records.

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

- Name, Date of Birth and Address
- Contact Telephone Numbers
- Subcontractor Rate Information
- Passport Details / Biometric Residents Cards / Visas / Right to Work Share Codes / Govt. Portal Right to Work Checks proving identity, checking for victims of Modern-Day Slavery and Right to Work in the UK
- Driving Licence Details
- Qualifications and Training Records

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 Consultancies for which we seek advice on legitimate business matters
- Construction Industry Scheme Service Providers

- CITB
- Banks
- Home Office
- External Training Providers
- Clients auditing our Right to Work processes and GDPR compliance

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, whilst you are working with us, at the time when your contract ends and for 3 years after you have left. This includes using information to enable us to comply with the 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 contract for services 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 several 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 regarding your personal data.

### How this affects you whilst working with us:

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.

## Enquiries 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](mailto: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 personnel engaged in J Coffey Construction operations:**

Signed: *Eddie Barrett* (Original Signed)

Date: 25/02/2026

Eddie Barrett

Group Managing Director

**On behalf of J. Coffey Construction**