

GDPR and the Data Protection Act 2018

The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018.

What is GDPR?

GDPR seeks to give people more control over how organisations use their personal data, any data which can be used to identify an individual is classed as personal data.

Under the GDPR, there are six data protection principles that the Company must comply with. These provide that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

How your information will be used

As your employer, we need to record and process personal information, the information we hold and process enables the company to properly fulfil its obligations to employees. Such processing will be directly linked to your employment with us and is principally used for personnel, administrative and payroll purposes.

We may at times need to process your data to pursue legitimate business interests, for example when we tender for a new job, prospective clients require curriculum vitas. This will include your name, qualifications and experience.

Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees and you will probably be surprised at how wide ranging this is.

The sort of information we hold:

- Employment application forms and curriculum vitas.
- Employment references.
- Your contract of employment and any amendments to it.
- Correspondence.
 - Letters sent to you regarding pay rises and other matters associated with your employment.
 - When at your request and with your permission, letter/s sent to your mortgage company, prospective landlords and letting agents confirming your salary and employment status.
- Information needed for payroll purposes, such as bank details and Ni numbers for salary payments, business expenses and benefits (private medical insurance, pensions and any other insurance relevant to your employment).
- Your contact details and emergency contact details.

- Sometimes information such as NI numbers, addresses and date of births are required to book you on training courses and to order CSCS cards.
- Copy of your passport, driver's license and proof of address, as proof of eligibility to work in the UK and in some cases to carry out DBS checks.
- Holiday records.
- Declaration of health forms. As a responsible employer, we need to monitor and be aware of any possible illnesses, disability or health problems our employees have, this is to enable us to deal with them appropriately and provide the right support and correct first aid in the case of a medical emergency. Consent is requested by the employee for this information.
- Sickness and other absence records. We may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay.
- Records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary, grievance and termination of employment.
- Equality monitoring. Information relating to your racial or ethnic origin, religious and philosophical beliefs or sexual orientation, **will remain anonymous**.
- Details of any accidents connected with work, including to and from work. Certain accidents must be reported to relevant authorities for health and safety purposes.

Although we do not regularly monitor telephone, email and internet usage, as detailed in your employment handbook (IT Policy), Employees should have no expectation of privacy in anything they create, store, send or receive using WCL's computer facilities.

We will only disclose information about you to third parties if it is at your request, **or**, if we are legally obliged to do so. In limited but necessary circumstances, where there are adequate safeguards in place, your information may be transferred outside of the EU or to an international organisation to comply with legal or contractual requirements.

Employee records and any personal documentation directly related to your employment will be stored for a period of 6 years after employment has ceased, the information stored thereafter will contain your name, dates of employment and, the capacity in which you were employed.

In some instances, employee records / personal information may need to be kept for longer than a period of 6 years, examples of this would be documentation relating to Health and Safety matters, accidents and legal disputes.

Data relating to PAYE, maternity pay or SMP (statutory mandatory pay) will be kept for 3 years after employment has ceased.

Your rights

The GDPR provides the following rights for individuals:

- 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
- Rights in relation to automated decision making and profiling

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

Should it be required, employees have the right to access their personal data, a request should be made in writing and the company must respond within one month of the request.

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 or Data Protection Act 1998 with regard to your personal data.

Please note that we may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

Changes to this privacy notice

The Company reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

Contact details of the data controller and data processor

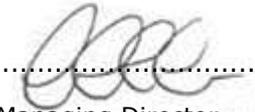
Westridge Construction is the **controller and the processor** of data for the purposes of the Data Protection Act 1998 and GDPR.

If you have any concerns as to how your data is processed you can contact:

Martin Buckthorpe (Managing Director)
Westridge Construction
Ruskin House
Bodiam Business Park
Junction Road
Bodiam
East Sussex
TN32 5UP
Email: m.buckthorpe@wcluk.co.uk
Tel: 01580 831 548

OR

Candice Beckingham (HR Manager)
Westridge Construction
Ruskin House
Bodiam Business Park
Junction Road
Bodiam
East Sussex
TN32 5UP
Email: c.beckingham@wcluk.co.uk
Tel: 01580 831 523

Signed:  Martin Buckthorpe

Date: October 2019

Position: Managing Director