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**BLENHEIM**  
BUILDING AND CONSTRUCTION

## DATA PROTECTION POLICY



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At Blenheim we respect the privacy rights of our staff, customers, suppliers and business partners. We are committed to managing personal data in a professional, lawful and ethical way.

This policy will be regularly reviewed and updated to ensure it remains relevant.

This policy was last updated in **May 2018**.

**Blenheim Building & Construction takes your privacy seriously. Please read the following to learn about our privacy policy.**

## 1.0 INTRODUCTION

### 1.1 Who are we?

Blenheim Building and Construction offer a range of construction services and have completed works in a wide variety of sectors over the last 19 years including listed buildings, police stations, schools, colleges, museums, banks & offices as well as the residential market. Our registered address is Penn House, 30 High Street, Rickmansworth, Hertfordshire, WD3 1EP. Our company number is 0208 428 2288.

### 1.2 Our approach to data protection

In line with the GDPR, we strive to ensure that our work adheres to 7 data protection principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

At Blenheim Building and Construction, we respect these principles and are committed to ensuring that we adhere to them. We aim to raise awareness amongst staff about the importance of protecting privacy and complying with this policy.

In order to comply with the GDPR, we will implement several processes into our workflow:

1. Regular data audits to keep records up to date.
2. Protocols for access requests.
3. Regular staff training.
4. Carry out Data Protection Impact Assessment's for every new contract.

## 2.0. IMPLEMENTING THE POLICY

### 2.1 How we collect and use your personal data

#### THIRD PARTIES:

Blenheim Building and Construction collects personal information when you visit our website, blenheimbuilding.co.uk, or when you use Blenheim Building and Construction's services. Information includes IP address, cookies, and any information you have disclosed to us.

#### EMPLOYEES:

We collect your personal information upon employment; where we ask you to provide several items:

Type of personal information	What we use it for
Name	For records/ payment/ legal requirements
DOB	For records/ legal requirements
Address	To post payslips/ records
NI number	Payment/ legal requirement
Bank details	Payment

## 2.2 Types of personal data processed by Blenheim Building and Construction

Blenheim Building and Construction processes two kinds of personal data:

1. Third parties; including clients, suppliers and business partners.
2. Employees; including unsuccessful applicants, former employees, and temporary workers under the direct supervision of Blenheim Building and Construction, such as independent contractors.

## 2.3 Purposes of processing personal data of employees

We process personal data of employees for the following purposes:

- Human resources and personnel management
- Business process execution and internal management
- Health, safety, security and integrity
- Organisational analysis and development, management reporting and acquisition and divestitures
- Compliance with laws and regulations

There must be a legal basis for the processing of any personal data. The basis shall be one or more of the following:

- (a) **Consent:** the individual has given clear consent for us to process their personal data for a specific purpose.
- (b) **Contract:** the processing is necessary for a contract we have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) **Legal obligation:** the processing is necessary for us to comply with the law.

- (d) **Vital interests:** the processing is necessary to protect someone's life.
- (e) **Public task:** the processing is necessary for us to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.
- (f) **Legitimate interests:** necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the individual

## 2.4 Purposes of processing personal data of third parties

Blenheim processes personal data of third parties for the following purposes:

Assessment and acceptance of a customer

- Conclusion and execution of agreements
- Health, safety, security and integrity
- Business process execution, internal management and management reporting
- Relationship management and marketing
- Development and improvement

The legal basis for the processing of any personal data of third parties is the same as set out in 2.3 above.

## 2.5 Retention policy

In compliance with the GDPR, particularly the Data Minimisation principle, we aim to only retain data which is necessary. Article 5 (e) of the GDPR states personal data shall be kept for no longer than is necessary for the purposes for which it is being processed.

There are some circumstances where personal data may be stored for longer periods (e.g. archiving purposes in the public interest, scientific or historical research purposes). When employment ceases, we dispose of all data after employment has ceased. Please see section 2.5 for our retention policy.

Data Type	Retention Period
CV's from unsuccessful applicants	6 months
Personnel files	6 years after employment has ceased

## 2.6 Your Rights

The GDPR has introduced several rights that individuals have. These include:

- The right to access the data you have collected about them.
- The right to correct any errors in the data you hold.
- The right to the erasure of certain kinds of data, commonly known as the “right to be forgotten”.
- The right to restrict your use of their data.
- The right to download their data and take it to another service provider.
- The right to object to your processing of their data.

## 2.7 Information, access and rectification

Each individual may request an overview of their personal data processed by or on behalf of Blenheim Building and Construction. Where reasonably possible, we will provide an overview of the source, type, purpose, categories of recipients and envisaged retention period.

If the personal data is incorrect, incomplete or not processed in compliance with the applicable laws and regulations, the individual may have their personal data rectified, erased, blocked, or its processing restricted. In addition, each individual shall have the right to receive their personal data and have the right to transmit those data to another controller.

You can request any data that we may hold about you by contacting [info@blenheimbuilding.com](mailto:info@blenheimbuilding.com).

## 2.8 Security measures and confidentiality

Blenheim Building and Construction has put several safeguards in place to protect personal data from misuse or accidental, unlawful, or unauthorised destruction, loss, alteration, disclosure, acquisition, access or other processing.

## 2.9 In the event of a personal data breach

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed by Blenheim Building and

Construction. Examples are the loss of a USB-key, visibility of personal data of employees on internet or the intrusion by a hacker.

In case of a personal data security breach the Blenheim Building and Construction Data Breach Procedure will be applicable. A security breach must be reported to the Data Protection Officer, who will then assess whether the security breach qualifies as data security breach.

In the case of a personal data breach, the Data Protection Officer shall, no later than 72 hours after Blenheim Building and Construction having become aware of it, notify the personal data breach to the competent supervisory authority of the Operating Company's country, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of individual(s).

In case of a personal data breach Blenheim Building and Construction shall report the breach to the individual(s) concerned if the personal data breach is likely to result in a high risk to the rights and freedoms of the individual within a reasonable period of time following discovery of such breach.

## 2.10 Complaints procedure

Individuals may file a complaint regarding compliance with this Policy or violations of their rights under applicable law with our Data Protection Officer.

The Data Protection Officer shall notify the Group Privacy Officer, initiate an investigation and when necessary, advise the business on the appropriate measures for compliance and monitor, through to completion, the steps designed to achieve compliance.

Within X weeks of Blenheim Building and Construction receiving a complaint, the Data Protection Officer shall ensure the individual is informed in writing of Blenheim Building and Construction's position with regard to the complaint and any action we have taken or will take in response. An individual may file a complaint with the Group Privacy Officer if the resolution of the complaint by the Data Protection **Officer is unsatisfactory to the individual.**



Blenheim Building and Construction

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