

	SCS Building Solutions Ltd	Section:	Policy Document
	Policy Document	Reference:	PD 009
	GDPR Policy	Page No:	Page 1 of 5

GDPR Policy

SCS Building Solutions Ltd (SCS) takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the Data Protection Act 2018 and the EU General Data Protection Regulation ('GDPR') in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.

This policy applies to current and former employees, workers, volunteers, apprentices, and consultants. If you fall into one of these categories then you are a 'Data Subject' for the purposes of this policy. You should read this policy alongside your Contract of Employment (or contract for services) and any other notice we issue to you from time to time in relation to your data.

SCS has measures in place to protect the security of your data in accordance with this policy. SCS will only hold data for as long as necessary for the purposes for which it was collected, or in accordance with any retention period prescribed by Law. SCS is a 'Data Controller' for the purposes of your 'Personal Data'. This means that we determine the purpose and means of the processing of your 'Personal Data'.

This policy explains how SCS will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing, or storing 'Personal Data' in the course of working for, or on behalf of, SCS.

This policy does not form part of your Contract of Employment (or contract for services if relevant) and can be amended by SCS at any time. It is intended that this policy is fully compliant with the Data Protection Act 2018 and GDPR. If any conflict arises between those laws and this policy, SCS intends to comply with the Data Protection Act 2018 and the GDPR.

Data Protection Principles

'Personal Data' must be processed in accordance with seven 'Data Protection Principles.' These are: -

- It must be processed fairly, lawfully, and transparently.
- It must be collected and processed only for specified, explicit and legitimate purposes.
- It must be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- It must be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay.
- It must not be kept for longer than is necessary for the purposes for which it is processed; and
- It must be processed securely.
- SCS are accountable for the proper processing of personal data and compliance with the rules of the GDPR.

Date Reviewed: 24/01/2025

Issue:	5	Issue Date:	January 2025	Review Date:	November 2025	Authorised By:	Paul Flynn
--------	---	-------------	--------------	--------------	---------------	----------------	------------

	SCS Building Solutions Ltd	Section:	Policy Document
	Policy Document	Reference:	PD 009
	GDPR Policy	Page No:	Page 2 of 5

Section 1 – Data Protection Officers

As a Data Controller we have appointed a Data Protection Officer who is responsible for overseeing compliance with this policy for the following companies:

SCS Building Solutions Ltd
SCS Special Projects Ltd

Data Protection Officer’s Contact Information

SCS Building Solutions Ltd
Newmarket Mews
Aberford Road
Stanley
Wakefield
WF3 4AL

Tel: 01132887111

Section 2 – What ‘Personal Data’ we collect

This ‘Personal Data’ might be provided to us by you, or someone else (such as a former employer, your doctor, or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process or during the course of the Contract of Employment (or services) or after its termination. It could be created by your Manager or other colleagues. We will collect and use the following types of ‘Personal Data’ about you: -

- Recruitment information such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments.
- Your contact details and date of birth.
- The contact details for your emergency contacts.
- Your gender.
- Your marital status and family details.
- Information about your Contract of Employment (or services) including start and end dates of employment, role, and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits, and holiday entitlement.
- Your bank details and information in relation to your tax status including your national insurance number.
- Your identification documents including passport and driving license and information in relation to your immigration status and right to work for us.
- Information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings).
- Information relating to your performance and behaviour at work.
- Training records.
- Electronic information in relation to your use of IT systems/swipe cards/telephone systems.
- Your images (whether captured on CCTV, by photograph or video).
- iTunes passwords and computer passwords.
- Any criminal convictions and offences.
- Any other category of ‘Personal Data’ which we may notify you of from time to time.

Issue:	5	Issue Date:	January 2025	Review Date:	November 2025	Authorised By:	Paul Flynn
--------	---	-------------	--------------	--------------	---------------	----------------	------------

	SCS Building Solutions Ltd	Section:	Policy Document
	Policy Document	Reference:	PD 009
	GDPR Policy	Page No:	Page 3 of 5

Section 3 – Why do we collect this ‘Personal Data’

SCS will process your ‘Personal Data’ in accordance with our obligations under the 2018 Act.

We will use your ‘Personal Data’ for: -

- Performing the Contract of Employment (or services) between us.
- Complying with any legal obligation; or
- If it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights in section 10 below.

We can process your ‘Personal Data’ for these purposes without your knowledge or consent. We will not use your ‘Personal Data’ for an unrelated purpose without telling you about it and the Legal basis that we intend to rely on for processing it.

If you choose not to provide us with certain ‘Personal Data’ you should be aware that we may not be able to carry out certain parts of the contract between us. For example, if you do not provide us with your bank account details we may not be able to pay you. It might also stop us from complying with certain legal obligations and duties which we have such as to pay the right amount of tax to HMRC or to make reasonable adjustments in relation to any disability you may suffer from.

Section 4 – Your Data Protection Rights

Under data protection legislation, you possess several rights. These rights are dependent upon our reasoning for processing your information:

The right of access – You have the right to obtain confirmation we are processing your ‘Personal Data’, a copy of this ‘Personal Data’ and other supplementary information.

The right to rectification – You have the right to rectify any incorrect or incomplete information we hold about you.

The right to erasure – You have the right to request for all ‘Personal Data’ we hold about you to be erased under the specified circumstances stated in The Data Protection Act.

The right to restrict processing – You have the right to restrict the processing of your ‘Personal Data’ where you have a particular reason for wanting the restriction.

The right to object to processing - You have the right to object to the processing of your ‘Personal Data’ at any time under the direct circumstances of The Data Protection Act.

The right to data portability – You have the right to request for your ‘Personal Data’ to be transferred to another organisation and or yourself.

Section 5 – Sharing your ‘Personal Data’

Sometimes we might share your ‘Personal Data’ with group companies or our contractors and agents to carry out our obligations under our contract with you or for our legitimate interests.

We require those companies to keep your ‘Personal Data’ confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

We do not send your ‘Personal Data’ outside the European Economic Area (EEA) and we will not share your information with third parties for the purposes of direct marketing.

Issue:	5	Issue Date:	January 2025	Review Date:	November 2025	Authorised By:	Paul Flynn
--------	---	-------------	--------------	--------------	---------------	----------------	------------



Section 6 – Data Retention

We will keep your personal information for the necessary duration based on the purpose for which it was collected. It will be stored in secure systems, following the guidelines outlined in our data retention table below:

Document	Retention Period	Legislation / Reference
Accounts Information	6 years from the end of the financial year in which the transaction was made	Companies Act
Bank Statements	6 years from the end of the financial year in which the transaction was made	Companies Act
Payroll Information	6 years from the end of the financial year in which the transaction was made	Pension Act, Taxes Management Act, Companies Act
Medical Records	40 years	HSE
Accident Records	3 years after the last entry or end of investigation if later	The Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 1995
Personnel Files	6 years after the Employment Cease	Limitations Act 1980 and Data Protection Act 1998
Recruitment Information	12 Months	One-year limitation for defamation actions under Limitations Act
Leases	12 years After the lease and Liabilities under the lease have terminated	Limitations Act 1980
Pension information	Permanently	Companies Act, Commercial, Pension Act
Insurance Certificates	40 years	Employers Liability Regulations 1998
Board Meeting mins, Shares, Dividends	Permanently	Companies Act
Directors Service Contracts	Permanently	Companies Act
Major Agreements of historical Significance	Permanently	Data Protection 1998
H&S Records	3 years for general records	HSE
H&S Hazardous Substances – COSHH Register	Until Revised with the exception of Asbestos which is 40 years	HSE
Main Contractor Contracts	12 years	Limitations Act 1980
Contract Site Files	12 years post project completion in line with the Main Contractor’s Contract	SCS Procedure
Disposal Records	3 years	HSE
Maintenance Records	5 years	HSE
Subcontractor Induction	40 years	HSE, Occupational Health Details

	SCS Building Solutions Ltd	Section:	Policy Document
	Policy Document	Reference:	PD 009
	GDPR Policy	Page No:	Page 5 of 5

Section 7 – Photos, Videos and the Company Website

When photos and videos can unmistakably identify a person, they are considered personal data according to data protection laws. Occasionally, we will capture images and videos at events to aid in case studies, marketing efforts, or internal reporting. We will consistently inform you about when and why we will be taking photographs. All such materials will be handled and stored according to our internal policies and procedures. Additionally, any CCTV footage collected from our car park and grounds will be utilised for security purposes and managed in accordance with our data retention table.

When someone visits our website, we utilise Google Analytics to monitor and analyse user interactions once the user has accepted the use of cookies. Google Analytics collects data such as; IP addresses, browser and device information and user behaviour on our site. We collect this data as it helps us maintain and monitor our website's performance, enabling us to enhance our services for users.

Google Analytics employs cookies to track sessions and interactions. The types of cookies used are;

- `_ga`: Identifies unique users; expires after two years.
- `_gid`: Tracks user behaviour within a session; expires after 24 hours.
- `_gat`: Throttles request rates; expires after one minute.

These cookies are first-party cookies set by your domain.

Users have the right to manage cookies, this includes the right to be informed, give consent, provide granular consent, withdraw consent, have your data deleted, have your data disclosed and not to be discriminated against. You can opt-out of Google Analytics tracking by downloading the Google Analytics Opt-out Browser Add-on [here](#), then hover your mouse over the icon of the extension in the browsers toolbar and flicking the switch to turn on Google Analytics blocking. User's data is shared with Google as a third party and is retained by ourselves for a maximum of 30 days.

Section 8 – Data Security

We have robust measures in place to minimise and prevent data breaches from taking place. Our IT system is protected and tested by our external IT Support company. Access to specific subsites and files are given to an individual if authorised by a Shareholding Director, this ensures that all sensitive data is handled by appropriate personnel. As part of our IT system, we have firewalls and virus scanning in place, we also ensure all company devices and systems are password controlled with two-factor authentication. All staff are made aware of our GDPR policy and comply to keep all data and privacy protected.

Should a breach of 'Personal Data' occur (whether in respect of you or someone else) then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals, then we must also notify the Information Commissioner's Office within 72 hours.

If you are aware of a data breach you must contact the IMS Administrator immediately and keep any evidence you have in relation to the breach.

Issue:	5	Issue Date:	January 2025	Review Date:	November 2025	Authorised By:	Paul Flynn
--------	---	-------------	--------------	--------------	---------------	----------------	------------