

Data Protection & GDPR Policy

One Group Construction (OGC) is required to process relevant personal data regarding our employees, suppliers and customers. This policy sets out our commitment to protecting personal data and how we will ensure that staff understand how to handle that data. We also have a Group Privacy Notice which can be found on the Group website (www.onegroupconstruction.com).

Scope

This policy applies to anyone working with personal data that is controlled or processed by or on behalf of OGC.

Personal information is defined as any data or information, in paper or digital format, relating to a living individual.

Where any of the group companies have individual requirements in addition to this policy, further details will be available on their individual websites.

Data Protection Principles

OGC is committed to complying with the Data Protection Act and General Data Protection Regulation (GDPR) principles. Our aim is to ensure that personal data is:

- Processed fairly and lawfully and in a transparent manner
- Collected for specified, explicit and legitimate purposes and shall not be further processed in any manner incompatible with those purposes
- Adequate, relevant and only limited to what is necessary
- Accurate and where necessary kept up to date
- Kept in a form which permits identification of data subjects, for no longer than is necessary
- Processed in a manner that ensures appropriate security of the personal data.

General Requirements

Personal data will only be accessed by those who need to for work purposes and it will not be divulged or discussed except when performing normal work duties.

All personal data will be kept safe and secure at all times, including in the office, public areas, home or in transit. Data breaches will be swiftly investigated and significant events will be reported to the Information Commissioner's Office (ICO) if they are likely to result in a risk to the rights and freedoms of individuals.

Any queries relating to data protection, both internal and external to the company, will be dealt with effectively and promptly.

As per GDPR requirements, the business will maintain a register of known personal data, its source, who we share it with, the lawful basis for processing, consent type and retention periods.

Information Sharing

Where there is the need to share personal data with other organisations in order to deliver services or perform our duties, this will only be done where we have permission or there is legal obligation for us to do so.

Personal data may be shared within OGC, or with other third parties, and the sharing can be:

- "Systematic" or routine information sharing where there is an established purpose or
- "Exceptional" or one-off decisions or in conditions of real urgency.

Where Data Sharing Agreements are required for 'on-going' or 'routine' information sharing arrangements with third parties, they will be approved by a Group Director and a register of all agreements will be maintained by the Business Improvement Manager.

Consent

Where consent is required OGC will ensure that the request is prominent and separate from our terms and conditions and that we ask individuals to positively opt-in. OGC will specify why we want the data and what we are going to do with it and individuals are free to withdraw their consent at any time.

Subject Access Requests (SARs)

OGC recognises that access to personal data held about an individual is a fundamental right provided in the Act and will ensure that all requests from individuals to access their personal data are dealt with as quickly as possible and within the timescales allowed in the legislation.

Individuals will be expected to submit SARs in writing and provide any necessary proof of identification as part of the request. OGC will not charge for these requests if they are reasonable in nature.

Complaints

Where an individual believes the law has been broken and their information has not been obtained fairly or handled securely by OGC, they have the right to complain to both the company, and or the ICO. This is also the case where an individual has requested a copy of their information and they are not happy with the response.

Any individual who considers that data is inaccurate or out of date may also request, in writing, that the information be corrected or erased. Individuals can also request that OGC stop handling their personal information if they believe this will cause them harm or distress.

In both cases, OGC will provide a written response indicating whether or not they are in agreement and if so, the action to be taken.

Training

Key staff will receive appropriate Data Protection training so that they understand their responsibilities.

Retention and Erasure Policy

As per Article 5 (e) of the GDPR, it is intended that personal data shall be kept for no longer than is necessary for the purposes for which it is being processed. Retention periods will vary for different categories of information and personal data will be reviewed periodically for archiving or deletion if appropriate.

Non Compliance

Serious breaches of this policy caused by deliberate, negligent or reckless behaviour, may result in disciplinary action and may even lead to criminal prosecution.

Where those breaching the policy are not OGC employees, this may be regarded as a breach of contract and could lead to termination of their contract with OGC.



Richard Neall
Chief Executive
May 2018

Privacy Notice

Visitors to our websites

When someone visits one of our websites we use a third party service, Google Analytics, to collect standard internet log information and details of visitors' behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do want to collect personally identifiable information through our website, we will be up front about it. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by some group companies

Some of our companies, such as SEHBAC, use cookies. You can read more about how they use them in their cookies policies on the individual websites.

People who contact us via social media

One Group Construction manage their own social media interactions.

If you send us a private or direct message via social media, the message may be stored but will not be shared with any other organisations without your consent.

People who email us

We will monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. You should be aware that any emails we send or receive may not be protected in transit.

Job Applicants

One Group Construction is the data controller for the information you provide during the recruitment process unless specifically otherwise stated. If you have any queries about the process or how we handle your information please contact our Recruitment Manager.

In general, all of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

Current Employees

One Group Construction process personal data relating to those we employ. We do this for employment purposes, to assist in the running of the business and/or to enable individuals to be paid.

The personal data includes identifiers such as Name, Date of Birth and personal characteristics such as gender and ethnic group and qualifications.

If you are employed by a Group company, relevant details will be provided to processors employed by the Group for services such as payroll and pension schemes. We have contracts in place with our data processors which means they cannot do anything with your personal information unless we have instructed them to do so.

We may also hold data that you have provided for health, safety and wellbeing and other operational reasons. Any data of this nature will be held securely by the relevant Group Company unless otherwise advised or there is a legal requirement to provide the data to a third party. This data will not be used for any other purpose than originally stated.

Your rights

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Complaints or queries

We encourage people to let us know if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you want to make a complaint about the way we have processed your personal information, you can contact us at dataenquiries@onegroupconstruction.com

How to contact us

If you would like further information about our privacy policy you can email dataenquiries@onegroupconstruction.com or write to:

Information Enquiries
30 Whitehouse Road
Ipswich
Suffolk
IP1 5LT



Richard Neall
Chief Executive
April 2018

