



Steve Hoskin Construction Ltd.

Building & Civil Engineering Contractors

General Data Protection Regulations 2018

Introduction

Steve Hoskin Construction Ltd needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the Company has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the Company's data protection standards and to comply with the law.

This Data Protection Policy was reviewed and updated on: 07 November 2023.

Why this policy exists

This general data protection regulations policy ensures Steve Hoskin Construction Ltd:

1. Complies with the data protection law and follows good practice.
2. Protects the rights of employees, customers and partners.
3. Is open about how it stores and processes individual's data.
4. Protects itself from the risks of a data breach.

Data Protection Law

The General Data Protection Regulations 2018 describes how companies, including Steve Hoskin Construction Ltd must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The General Data Protection Regulations 2018 is underpinned by seven important principles. These say that personal data must be used only for:

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



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7. Accountability.

People, Risks & Responsibilities

Scope

This policy applies to:

- The head office of Steve Hoskin Construction Ltd.
- All employees of Steve Hoskin Construction Ltd.
- All contractors, suppliers and other people working on behalf of Steve Hoskin Construction Ltd.

It applies to all data that the Company holds, relating to identifiable individuals, even if that information technically falls outside of the General Data Protection Regulations 2018. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Any other personally identifiable information (PID)

Data Protection Risks

This policy helps to protect Steve Hoskin Construction Ltd for some very real data security risks, including:

- **Breaches of Confidentiality** – for instance, information being given out inappropriately.
- **Failing to offer choice** – for instance, all employees should be free to choose how the company uses data relating to them.
- **Reputational damage** – for instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with Steve Hoskin Construction Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and the data protection principles.

However, these people have key areas of responsibility:



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- The Chairman, Steve Hoskin and Directors, Neil Hoskin and Charlotte Worden, are ultimately responsible for ensuring that Steve Hoskin Construction Ltd meets its legal requirements.
- The Data Protection Officer, Helen Lazarus, is responsible for:
 - Keeping the directors updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Arranging data protection training and advice for people covered in this policy.
 - Handling data protection questions from employees and anyone else covered by this policy.
 - Dealing with requests from individuals to see the data Steve Hoskin Construction Ltd holds about them (known as Subject Access Requests – SARs)
 - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The Technical Coordinator, is responsible for:
 - Ensuring all systems, service and equipment used for storing data meets acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - Evaluating any third-party services, the Company is considering using to store or process data. For instance, cloud computing services.
- The HR Manager, Helen Lazarus is responsible for:
 - Approving any data protection statements attached to communications such as emails and letters.
 - Addressing any data protection queries from journalists or media outlets like newspapers.
 - Where necessary working with other employees to ensure marketing, and associated initiatives abide by data protection principles.

General Employee Guidelines

- The only people able to access data covered by this Policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from the HR Manager.
- **Steve Hoskin Construction Ltd will provide training** to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be** used and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the Company or externally.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of in line with our retention and disposal policy.



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- Employees **should request** help from their HR Manager or data protection officer if they are unsure about any aspect of data protection.

Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Technical Coordinator or Data Protection Officer.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

The more important it is that personal data is accurate, the greater the effort Steve Hoskin Construction Ltd should put into ensuring its security.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as **few places as necessary**. Employees should not create any unnecessary additional data sets.
- Employees should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- Steve Hoskin Construction Ltd will make it **easy for data subjects to update the information** held about them. For instance, by contacting the HR Manager.
- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from any contact list or database.

Subject Access Requests (SAR)

All individuals and employees who are the subject of data held by Steve Hoskin Construction Ltd are entitled to:

- Ask **what information** the company holds about them.



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- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its data protection obligations**.

If an individual contacts the Company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email addressed to the data protection officer – helen.lazarus@shc-ltd.co.uk. The data protection officer can supply a standard request form, although individuals do not have to use this.

The data protection officer will aim to provide the relevant data with 40 days.

The data protection officer will always verify the identity of anyone making a subject access request before handing them over any information.

Disclosing Data for Other Reasons

In certain circumstances, the General Data Protection Regulations 2018 allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Steve Hoskin Construction Ltd will disclose requested data. However, the data protection officer will ensure the request is legitimate, seeking assistance from the Directors and from the company's legal advisers where necessary.

Providing Information

Steve Hoskin Construction Ltd aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being stored
- How to exercise their rights

To this end, the Company has a privacy policy, setting out how the data relating to the individuals is to be used by the Company.

This is available on request. A version of this statement is also available on the Company's website. www.shc-ltd.co.uk