

Data Protection Policy Statement

Introduction

Hannafin Contractors Limited gathers and uses personal information about individuals.

These can include employees, customers, and suppliers. However, this may also include any other business or persons we may come into contact with.

We have created and implemented this policy to ensure that we fully comply with data protection law, including the General Data Protection Regulations (GDPR).

In order to achieve compliance and ensure the safety and protection of the rights of individuals, we aim to follow and demonstrate evidence of the principles outlined in Article 5 of GDPR, which require that personal data will be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary in relation to its purpose;
- Accurate, and where necessary, kept up to date;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purpose for which it is being processed
- Processed in a manner that ensures appropriate security of the personal data

Scope

This policy applies to the head office of Hannafin Contractors Limited, all clients premises such as the construction sites we work on, all employees, suppliers, contractors and other people working on behalf of the company.

It applies to all data that the company holds relating to identifiable individuals. This can include the names of individuals, national insurance numbers, contact details such as postal and e-mail addresses, telephone numbers and other such personal information.

Rights

We will always endeavour to ensure the rights of individuals are protected. We will do this by ensuring you have:

- 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
- The right not to have your personal data used in automated decision making and profiling.



Risks

The implementation of this policy is aimed to protect both the company, and individuals whose data we hold, from serious data breaches. We have policies and procedures in place to ensure that security and best practice in dealing with personal data is maintained in both electronic and hard copy formats.

In the unlikely event of a personal data breach, that is likely to result in a risk to the rights and freedoms of individuals, Hannafin Contractors Limited will notify the relative supervisory authority within 72 hours of being made aware of the breach.

Storage

Paper / Hard Copy

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot access it. When not required, paper containing personal information should be kept in a locked place such as a drawer or cupboard.

When personal data is no longer required it will be shredded and disposed of securely.

Electronic

When data is stored electronically, access to the electronic devices will be password or PIN code protected. Data stored on removable media such as a CD or USB stick will also be kept in a secure location when not in use.

Servers will be sited in a secure location and backed up daily.

Subject Requests

If an individual contacts the company requesting their information then we aim to provide them this information without delay and free of charge. However, depending on the nature and complexity of the request it may take up to a month to process and may incur an administration charge if the request is manifestly unfounded or excessive.

In some circumstances these regulations allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. In these situations Hannafin Contractors Limited will ensure that the request is legitimate, seeking advice from the Managing Director and legal advisors where necessary.

Everyone who works for or with the company will be responsible for ensuring data is collected, stored and handled appropriately. The company will ensure that this policy is communicated to all involved and will provide the necessary arrangements and resources to ensure full compliance with the GDPR, including an annual review of this policy as a minimum requirement.

Third Parties

Hannafin Contractors Limited will only use your personal information for the purposes for which we collected it. To help us achieve this, we may share your information with specific third parties and contractors in order to fulfil our obligations to you. Third parties and contractors may vary from each



specific contract, but could include occupational health providers, IT software and system providers, auditing purposes and training providers.

The use of these approved third parties and contractors are strictly to perform activities or support activities on behalf of Hannafin Contractors Limited. We will never pass on or sell your details to another company for the purposes of marketing.

Where necessary, we may have to share your personal data with the police or other law enforcement or governmental agencies in order to maintain the safety and security of our people, premises, or other locations under our occupation.

Retention

Our retention periods for personal data are based on business needs and legal requirements. We retain personal data for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we retain certain contractual details and correspondence until the time limit for claims arising from the contract has expired, or to comply with regulatory requirements regarding the retention of such data. When personal data is no longer needed, we securely destroy the data in all of its formats.

Signed by

A handwritten signature in black ink, appearing to be "PH" followed by a long horizontal stroke and a small loop at the end.

Mr. Peter Hannafin B.Eng
Managing Director

Dated 9th October 2018

