



Whitland Engineering Ltd

UNIT B - WEST STREET - WHITLAND - CARMS - SA34 0AE

Whitland Engineering Ltd Data Protection Policy.

1. Purpose of the Document

This document has been created to enable Whitland Engineering Ltd. to comply with the General Data Protection Regulation (GDPR) legislation 25th May 2018. This policy specifies what data is held, where the data has come from, where the data is held, who the data is shared with, how we identify where it came from, and what permissions have been given. It also covers how authorities are obtained, how authorities can be withdrawn, how data is protected and what happens when the systems fail.

Personal data sometimes called **personal information** includes your name, address, date of birth and national insurance number. Most people would expect that but personal data means any information relating to an identified or identifiable individual who can be identified directly or indirectly by that data or information, for the purposes of the regulations the person is known as the **Data Subject**. The Company is classed as a “**Data Controller**” under the General Data Protection Regulation 2018. Those organisations to which the Company passes personal information are classed as “**Data Processors**”, each of which will have a contract in place with the Company which will cover data protection issues to ensure that the data is secure. The “**Data Manager**” for the Company is its Board of Directors.

Under the General Data Protection Regulations 2018, individuals have rights which you can exercise in relation to the information the company holds about you. You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Individual rights include:

- **Complaints or queries**

Whitland Engineering Ltd tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention 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.

This privacy notice does not provide exhaustive detail of all aspects of Whitland Engineering Ltd's collection and use of personal information. However, we are

happy to provide any additional information or explanation needed. Any requests for this should be sent to the address in section 10 of this policy.

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioners Office (ICO) in their capacity as the statutory body which oversees data protection law – www.ico.org.uk/concerns.

- **Access to personal information**

Whitland Engineering Ltd tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the General Data Protection Regulations 2018. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Whitland Engineering Ltd for any personal information we may hold you need to put the request in writing addressing it to the Personal department, or writing to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Information Governance department.

- **Correction of incorrect personal data**

Whitland Engineering is concerned to ensure that all personal data held is accurate and complete. If individuals believe that the information is incomplete or inaccurate then please let the personnel department know immediately.

- **Right to erasure of personal data**

Under certain grounds the data subject has the right to obtain from the controller the erasure of personal data concerning him or her. These grounds include:

- Personal data is no longer needed
- Data subject withdraws consent on which processing is based and where there are no other legal grounds for processing
- Personal data has been unlawfully processed
- Personal data must be erased for compliance with legal obligation

2. About the Company

Established in the 1980s, Whitland Engineering uniquely provides multi-disciplined project delivery throughout the UK. The Company is recognised as specialist providers of engineering and project management services to many sectors including Utilities, Water, Food and Dairy Industries.

The Company has a diverse scope of supply enabling it to consistently provide cost effective engineering solutions across the UK and includes:

- In house detail design;
- Mechanical fabrication & installations;
- Electrical engineering;
- Process logic control systems;
- Civil engineering;
- CE certified structural steel fabrication;
- Turnkey project management.

The objects of the Company are identified in the Articles of Association which are lodged at Companies House, the registration number of the Company is 2566083.

As a Limited Company Whitland Engineering must comply with many laws and regulations including but not limited to:

- The Company Act 2006.
- The Health & Safety at Work Act 1974
- Construction (Design and Management) Regulations 2015
- UK taxations laws & regulations notably Income Tax Regulations 2003
- Immigration Order 2014
- British Standard European Norm (BSEN) 1090 relating to CE marking of structural steel
- Environmental Protection Act 1990
- Employment Law
- General Data Protection Regulation 201

3. What data is held.

To achieve the Objects of the Company, and to satisfy the requirements of the legislation applicable to the Company it is necessary for the Company to hold personal data relating to employees, labour only sub contractors, employees of customers and employees of suppliers.

All of the personal information provided to the company will only be used for legitimate reasons entirely related to the relationship of the individual with the company and to comply with legal requirements.

We will not share any personal information provided to the company with any third parties for marketing purposes or store any personal information outside of the European Economic Area. The personal information provided will be held securely by the company and/or contracted data processors whether the information is in electronic or physical format.

The company will use the contact details individuals provide to only contact them in the context of the company and its relationship with the individual.

The company will not collect more information than is needed to fulfil the companies stated purposes and the information will not be retained for longer than is necessary.

This data includes

For Employees:

- For contact and emergency contact - name, address, telephone number, email address and next of kin details.
- For wage payments, P45 or P60 from previous employer, pension payments and tax deductions made - date of birth, national insurance number, bank account number.
- For eligibility to drive company vehicles and to comply with company insurance conditions copy of driving licence.
- To comply with the Immigration Order 2014 proof of identity, national insurance number, birth certificate, UK pass port.
- To comply with Income Tax Regulations 2003 - name, address, bank account number, national insurance number, birth certificate, sickness and absence records, holidays accrued and taken, wage payment records including tax and pension payments and receipts, time sheets including record of hours worked, place of work, work carried out, benefits in kind records and business expenses claimed.
- For proof of competency to comply with company insurance conditions, client requirements, BSEN 1090 and health and safety legislation - academic qualifications, training records, personal references, CV, personal protective equipment issues, health questionnaire and medical records.
- To comply with National Employment Savings Trust (NEST) to set up employees workplace pension. All employees will be auto-enrolled into the pension scheme and the details that we will provide to NEST will be your name, address, national insurance number, date of birth, salary, bank details and pension payments. This information will be retained by the Company for the duration of employment plus 6 years following the end of your employment.
- General correspondence to and from employees.

For Sub Contractors:

- For contact and emergency contact - name, address, telephone number, email address.
- For invoice payments, National Insurance number, Unique Tax Pay reference and bank account number.
- For eligibility to drive company vehicles and to comply with company insurance conditions copy of driving licence.
- For proof of competency to comply with company insurance conditions, client requirements, BSEN 1090 and health and safety legislation - academic qualifications, training records, personal references, CV, personal protective equipment issues, health questionnaire and medical records.
- General correspondence to and from labour only sub contractors.

Engagement Process for employees and labour only sub contractors

All of the information employees and labour only sub contractors provide during the engagement process is used for accessing engagement applications, managing any subsequent engagement, paying you for your services or to fulfil legal or regulatory requirements that are necessary.

We will not share any of the information provided to the company with any third parties for marketing purposes or store any of the information outside of the European Economic Area. The information provided will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment and engagement. You don't have to provide what we ask for but it might affect your application if you don't.

Any information generated during the interview and engagement process including for example notes will be retained by the company for 6 months following closure of the recruitment campaign.

For Customers:

Whitland Engineering does not engage in business to business marketing and does not therefore use or process corporate or individual e mail addresses to provide marketing messages.

Whitland Engineering does communicate with individual employees of its corporate customers and individuals who are non-corporate customers. This is normally by e mail, snail mail and telephone and directly relating to enquiries made of the company most particularly invitation to tender.

All e mail addresses are securely held on pass word protected company computers, this includes best practice for data backup, storage and malware / virus protection.

For Suppliers:

Whitland Engineering does communicate with individual employees of its corporate suppliers and individuals who are non-corporate suppliers. This is normally by e mail, snail mail and telephone and directly relating to enquiries placed on existing suppliers or new suppliers who accept the invitation to tender.

All e mail addresses are securely held on pass word protected company computers, this includes best practice for data backup, storage and malware / virus protection.

4. Where the data comes from.**For Employees:**

Data is obtained from employees application for employment forms when they join the company including health questionnaires, curriculum vitae, training and academic certificates and subsequently from personal records as they accumulate mainly in the form of wage payment records, tax and pension payments, training records, time sheets, sickness records, notices from employees of changes of address and bank details, and general correspondence from employees to the company (all either in paper or electronic form).

For Sub Contractors:

Data is obtained from Sub Contractors via a pre-engagement questionnaire including health questionnaires, bank account details, curriculum vitae, training and academic certificates and subsequently from records as they accumulate mainly in the form of invoice payment records, Construction Industry Scheme (CIS) tax deductions, training records, time sheets and general

correspondence from labour only sub contractor to the company (all either in paper or electronic form).

For Customers:

Directly from individual employees of corporate customers and individuals who are non-corporate customers. This is normally by e mail, snail mail and telephone and directly relating to enquiries received from existing customers or new customers who open the line of invitation to tender.

For Suppliers:

Whitland Engineering places direct enquiries for goods and services with individual employees of corporate suppliers and individuals who are non-corporate suppliers.

5. Where the data is held.

The Companies data is held principally on a computer server located in the main office which is maintained and managed by a 3rd party company specialising in data processing systems who ensure that all the company IT facilities are secure, this includes best practice for data backup, storage and malware / virus protection.

Data held on the Server is automatically backed up at intervals during the day to an external data storage facility (datto) and internally on site. The backup process is automatically monitored to ensure it is correctly executed each day with automatic alerts to the specialist provider in the circumstance of backup failure or disruption. The contracted service provides for immediate corrective action by the provider and reporting of the same to the company. The backup data is held for three months on site and six months offsite to ensure that historical data can be retrieved in the event of a file becoming corrupt, accidentally deleted or over written. The six-month external backup also mitigates the risk of dormant malware corruption of the historical data. The Datto system provides for direct log on facilities by all authorized company users in the circumstance of a complete failure of the in-house server thus ensuring uninterrupted use and access of all company electronic data including those pertaining to the company quality management systems and records.

Personal data is entered and managed by the companies appointed Finance Manager and administration team, who are responsible for the input of employees personal information onto the server.

The Finance Manager, Administration Team and Directors of the Company access the database through dedicated computers which are owned and maintained by the Company. Standalone hard drive backups are periodically taken and provided to the Companies external financial auditors, Evens & Co

of Milford Haven who prepare the Companies and Directors annual return for submission to Company House in accordance with legal obligations under the Company Act 2006.

Paper documents are held primarily by the Finance Manager in a locked filing cabinet located in the main office. Personal documents relating to wage payments, pension payments, tax, bank account details, telephone numbers, national insurance numbers, driving licenses, proof of identity are held for a minimum of seven years following the date when an employee's employment ceases.

Training records, work records, personal protective equipment issues are held in perpetuity. Financial Data and personal data of the Directors and Company Secretary is also submitted to Companies House in accordance with the Company Act 2006 and is visible and downloadable by third parties from the Company House portal.

6. Who the data is shared with.

SAGE (Provider of specialist accounting and payroll computer software)
National Employment Savings Trust (NEST) provider of pension scheme
Inland Revenue
Evens&Co (Financial Auditors)
Barclays Bank provider of companies banking arrangements
Morgan & Morgan (provider of Information Technology specialist support)
Customers (usually require employees name and proof of competency being academic qualifications, training certificates and fit to work evidence for all Whitland Engineering employees and labour only subcontractors working on their sites)
Office of National Statistics have requirements for details of employees' personal data.
Government Agencies for child support payments
Local Authority for unpaid council tax
County Court for collection of monies owed

7. How the data source is identified.

The SAGE database SAGE 50 accounts and payroll is the main storage and management system for the Companies payroll, customer payment received and supplier payments made.

8. What happens if you are aware of a data breach.

Should an employee or labour only sub contractor become aware that there is a failure in the Company system regarding Data Protection, then the first approach should be to A Company Director to rectify matters. Should this prove unsatisfactory, then employees have recourse to the companies' complaints procedure.

9. Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 25th May 2018.

10. How to contact us

If you want to request information about our privacy policy you can email us at info@whitlandengineering.co.uk or write to:

Information Governance department
Whitland Engineering Ltd
Unit B
West Street
Whitland
Carmarthenshire
SA34 0AE

Summary

- We will only collect personal data about you where it is completely necessary or you have consented.
- We will not disclose your personal data to 3rd parties except appropriately contracted data processors who help us keep your data secure or help us to provide it to the regulatory authorities.
- We will protect your personal data with appropriate procedures and technical controls.
- You have rights to your personal data, these are detailed under section 1 of this policy.
- If you have a complaint please see how to make one detailed under section 1 and to contact us under section 10 of this policy.
- If you have any questions relating to your personal data or believe the information we hold about you is incorrect or if you believe that we are no longer entitled to use your personal data then please contact us as detailed under section 10 of this policy.