



Data Protection Policy

Introduction

Conway Cladding Ltd is committed to safeguarding the privacy and personal data of all employees, contractors, and stakeholders in compliance with the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This policy outlines how we collect, process, store, and share personal data to ensure that it is handled with the highest standards of security and confidentiality.

Scope

This policy applies to all employees, contractors, and anyone whose personal data is processed by Conway Cladding Ltd. It covers all personal data collected, whether through electronic, paper, or other means.

Data Collected

Conway Cladding Ltd collects and processes personal data for specific and legitimate business purposes. The personal data we collect may include, but is not limited to:

- Name
- Contact details (e.g., address, phone number, email)
- National Insurance number
- Payroll information (e.g., bank details, salary, tax information)
- Certification details (e.g., trade qualifications, safety certifications)

Purpose of Data Collection and Processing

Conway Cladding Ltd collects and processes personal data for the following purposes:

- **Payroll Purposes:** Personal information, including bank details and tax information, will only be used to administer employee and contractor payroll, ensuring accurate and timely payment of wages, taxes, and benefits.
- **Certification Information:** Certification details (e.g., trade qualifications, health and safety certifications) will be shared with **Main Contractors** where required to meet compliance obligations for project work and site access. This is necessary to ensure that all individuals working on sites meet the relevant safety and competency standards.

Data Sharing

Conway Cladding Ltd will only share personal data where it is necessary to fulfill business or legal obligations. This includes:

- **Main Contractors:** Certification details may be shared with Main Contractors to demonstrate compliance with site safety and skill requirements.
- **Third-Party Service Providers:** Personal data may be shared with third-party providers such as payroll service companies, who process data on our behalf. These providers are required to handle data securely and only for the purpose of delivering their services.

We will not share personal information with any other third parties unless required by law or with your explicit consent.

Data Security

Conway Cladding Ltd takes the security of personal data seriously. We implement appropriate technical and organizational measures to protect personal data from unauthorized access, alteration, disclosure, or destruction. This includes:

- Secure storage of digital and paper records.
- Regular reviews of data access controls.
- Encryption and password protection for sensitive data.

Data Retention

Conway Cladding Ltd will retain personal data only for as long as necessary to fulfil the purpose for which it was collected, including any legal, accounting, or reporting obligations. After this period, personal data will be securely deleted or anonymized.

Rights of Data Subjects

Individuals whose personal data is processed by Conway Cladding Ltd have the following rights under the GDPR:

- **Right to Access:** You have the right to request access to the personal data we hold about you.
- **Right to Rectification:** You can request that we correct any inaccurate or incomplete personal data.
- **Right to Erasure:** You can request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected.
- **Right to Restrict Processing:** You can request that we restrict the processing of your data in certain circumstances.
- **Right to Data Portability:** You can request a copy of your personal data in a commonly used format.
- **Right to Object:** You can object to the processing of your personal data for specific purposes.

To exercise any of these rights, please contact **Joseph Conway** at joseph@conwaycladdingltd.com.

Data Breaches

In the event of a data breach that poses a risk to individuals' rights and freedoms, Conway Cladding Ltd will promptly notify the Information Commissioner's Office (ICO) and affected individuals in line with GDPR requirements.

1Policy Review

This Data Protection Policy will be reviewed regularly to ensure compliance with relevant laws and regulations and to reflect any changes in business practices.

Date: 01 May 2024

Date for review: 30 April 2025

Signed:

A handwritten signature in black ink, appearing to read 'Joseph Conway', written over a horizontal line.

Joseph Conway
Managing director
Conway Cladding Ltd