

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 Data Protection Lead.

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
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