

DATA PROTECTION POLICY

Crossway Scaffolding (Elland) Limited is committed to ensuring that all personal data handled by us will be processed according to the Data Protection Act 2018. We are committed to ensuring compliance with the Data Protection Act and to retain your confidence in how we handle and protect your data.

The General Data Protection Regulations (GDPR) sets out the rules for how organisations must process personal data and sensitive personal data about living individuals. It gives individuals the right to find out what personal data is held about them by organisations and to request to see, correct or erase personal data held.

Crossway Scaffolding (Elland) Limited needs to collect and process personal data about the people (including employees and individuals) it interacts with to carry out its business effectively. Crossway Scaffolding (Elland) Limited is committed to ensuring that employees are appropriately trained and supported to achieve compliance with GDPR.

Crossway Scaffolding is a data controller of the personal data in connection with its employees and of customer and supplier details.

This policy applies to all personal data and special category personal data collected and processed by Crossway Scaffolding (Elland) Limited in the conduct of its business and applies to both automated personal data and to manual filing systems.

This policy applies to all Crossway Scaffolding (Elland) Limited employees, whether permanent, temporary, contractors, or consultants.

Personal data

Personal data is defined in the GDPR:

Personal data means any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Special categories of personal data relate to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Data protection principles

GDPR outlines six principles which underpin the handling of personal data. To ensure compliance with the Regulation, Crossway Scaffolding (Elland) Limited must ensure that personal data is:

1. Processed lawfully, fairly and in a transparent manner (**lawfulness, fairness and transparency**). In practice this means:
 - Having a legitimate ground for collecting and using personal data.
 - Not using personal data in a way that would have an adverse effect on the individual concerned.
 - Being transparent about how you intend to use personal data and provide privacy notices where appropriate.
 - Handling personal data in a way that the individual would reasonably expect.
 - Ensuring that you do nothing unlawful with personal data.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (**purpose limitation**). In practice this means:
 - Being clear about why you are collecting personal data and what you will do with it.
 - Providing privacy notices when collecting personal data.
 - Ensuring that any additional processing of personal data is fair.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**data minimisation**). In practice this means:
 - Only processing the personal data that is necessary.
4. Accurate and, where necessary, kept up to date (**accurate**). In practice this means:
 - Taking reasonable steps to ensure the accuracy of any personal data held.
 - Ensuring that the source of the personal data is clear.
 - Carefully considering any challenges to the accuracy of personal data.
 - Considering whether it is necessary to update the information.
5. Not kept for longer than is necessary for the purpose (**storage limitation**). In practice this means:
 - Reviewing the length of time you keep personal data for.
 - Considering the purpose you hold the personal data for in deciding whether, and how long, you retain it.
 - Securely deleting information that is no longer needed.
6. Processed in a manner that ensures the security of data using appropriate technical and organisational measures against unauthorised or unlawful processing, loss, damage or destruction (**integrity and confidentiality**). In practice this means:
 - Designing and organising security to fit the nature of the personal data held and the harm that may result from the breach.
 - Ensuring that the right physical and security measures are in place, backed by robust policies and procedures and reliable, well-trained employees.
 - Reporting security breaches promptly so that they can be reported to the Information Commissioner's Office (ICO) within the required 72 hours timescale.

Crossway Scaffolding (Elland) Limited, as the data controller, is responsible for and able to demonstrate compliance with these principles.

Access to personal data

Employees will have access to personal data only where it is required as part of their functional remit.

All data subjects (including employees, applicants and others who interact with Crossway Scaffolding (Elland) Limited) are entitled to make a Subject Access Request to ask Crossway Scaffolding (Elland) Limited whether it holds any personal data relating to them and, if so, to be given a description of and a copy of that personal data.

Subject Access Requests are co-ordinated by the HR & Training Manager.

Data sharing

Personal data will not be transferred outside the European Economic Area unless that country or territory can ensure an adequate level of protection for the rights and freedoms of the data subjects in relation to the processing of their personal data.

Personal data in any format will not be shared with a third party organisation without a valid business reason, a contract or Data Sharing Agreement in place, or without the data subject’s consent. As Crossway Scaffolding (Elland) Limited carries out work for third parties all employees are required asked to sign a Privacy Notice which details the third parties but this includes NASC, the Rail Industry, CITB, CSCS, and other regulatory bodies in the course of our work.

Attached as Appendices are the appropriate privacy notices which sets out what information we use, store, share and manage for the relevant parties.

Compliance


Breaches of this policy will be investigated and appropriate actions taken.

Review

This policy will be reviewed annually or as business reasons dictate.

Appendices

- Appendix A – Employee Privacy Notice
- Appendix B – Candidates Privacy Notice
- Appendix C – Website Privacy Notice
- Appendix D – Suppliers Privacy Notice
- Appendix E – Customers Privacy Notice

Steve Fearnehough - Managing Director	
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