Contractors Design (CDS) Ltd
6 Millers House, Roydon Road,
Stanstead Abbotts,
Hertfordshire SG12 8HN
Tel: 01920 877077
Email:enquiries@contractorsdesign.co.uk
Web: www.contractorsdesign.co.uk

Data Protection Policy

1. Introduction

This Policy sets out the obligations of Contractors Design (CDS) Ltd, a company registered in England under number 12475525, whose registered office is at 6 Millers House, Roydon Road, Stanstead Abbotts, Herts SG12 8HN ("the Company") regarding data protection and the rights of clients and business contacts ("data subjects") in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation ("GDPR") 2018.

This Policy sets the Company's obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees and other parties working on behalf of the Company.

2. Scope

2.1 The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2.2 The Company's Data Protection Officer is Nicki Bennison, Commercial Director. She is responsible for administering this Policy and for developing and implementing any applicable related policies, procedures, and/or guidelines.

2.3 All Directors within the company are responsible for ensuring that all employees or third parties working on behalf of the Company comply with this Policy and, where applicable, must implement such practices, processes, controls, and training as are reasonably necessary to ensure such compliance.

2.4 Any questions relating to this Policy or to Data Protection Law should be referred to the Data Protection Officer. In particular, the Data Protection Officer should always be consulted in the following cases:

a) if there is any uncertainty relating to the lawful basis on which personal data is to be collected, held, and/or processed;

b) if consent is being relied upon in order to collect, hold, and/or process personal data;

c) if there is any uncertainty relating to the retention period for any particular type(s) of personal data;

d) if any new or amended privacy notices or similar privacy-related documentation are required;

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e) if any assistance is required in dealing with the exercise of a data subject's rights;

f) if a personal data breach (suspected or actual) has occurred;

g) if there is any uncertainty relating to security measures (whether technical or organisational) required to protect personal data;

h) if personal data is to be shared with third parties (whether such third parties are acting as data controllers or data processors);

i) when any significant new processing activity is to be carried out, or significant changes are to be made to existing processing activities, which will require a Data Protection Impact Assessment;

j) when personal data is to be used for purposes different to those for which it was originally collected.

3. The Data Protection Principles

This Policy aims to ensure compliance with Data Protection Law. The GDPR sets out the following principles with which any party handling personal data must comply. Data controllers are responsible for, and must be able to demonstrate, such compliance. All personal data must be:

3.1 processed lawfully, fairly, and in a transparent manner in relation to the data subject;

3.2 adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed;

3.3 accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay;

3.4 processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

4. The Rights of Data Subjects

The GDPR sets out the following key rights applicable to data subjects:

4.1 The right to be informed;

4.2 the right of access;

4.3 the right to rectification;

4.4 the right to erasure (also known as the 'right to be forgotten');

4.5 the right to restrict processing;

4.6 the right to data portability;

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5. Adequate, Relevant, and Limited Data Processing

5.1 The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed).

5.2 Employees or other parties working on behalf of the Company may collect personal data only to the extent required for the performance of their job duties and only in accordance with this Policy. Excessive personal data must not be collected.

5.3 Employees or other parties working on behalf of the Company may process personal data only when the performance of their job duties requires it. Personal data held by the Company cannot be processed for any unrelated reasons.

6. Accuracy of Data and Keeping Data Up-to-Date

6.1 The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject.

6.2 The accuracy of personal data shall be checked when it is collected. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

7. Data Retention

7.1 The Company shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

7.2 When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

8. Secure Processing

8.1 The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

8.2 All technical and organisational measures taken to protect personal data shall be regularly reviewed and evaluated to ensure their ongoing effectiveness and the continued security of personal data.

8.3 Data security must be maintained at all times by protecting the confidentiality, integrity, and availability of all personal data as follows:

a) only those with a genuine need to access and use personal data and who are authorised to do so may access and use it;

b) personal data must be accurate and suitable for the purpose or purposes for which it is collected, held, and processed; and

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c) authorised users must always be able to access the personal data as required for the authorised purpose or purposes.

9. Keeping Data Subjects Informed

9.1 The Company shall provide the information to every data subject:

a) where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and

b) where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:

i) if the personal data is used to communicate with the data subject, when the first communication is made; or

ii) if the personal data is to be transferred to another party, before that transfer is made; or

iii) as soon as reasonably possible and in any event not more than one month after the personal data is obtained.

10. Data Subject Access

10.1 Data subjects may make subject access requests ("SARs") at any time to find out more about the personal data which the Company holds about them, what it is doing with that personal data, and why.

10.2 Employees wishing to make a SAR should do using a Subject Access Request Form, sending the form to the Company's Data Protection Officer.

10.3 Responses to SARs must normally be made within one month of receipt, however, this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

10.4 All SARs received shall be handled by the Company's Data Protection Officer.

11. Rectification of Personal Data

11.1 Data subjects have the right to require the Company to rectify any of their personal data that is inaccurate or incomplete.

11.2 The Company shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Company of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

11.3 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

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12. Erasure of Personal Data

12.1 Data subjects have the right to request that the Company erases the personal data it holds about them in the following circumstances:

a) it is no longer necessary for the Company to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;

b) the data subject wishes to withdraw their consent to the Company holding and processing their personal data;

c) the data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so);

d) the personal data has been processed unlawfully;

12.2 Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

12.3 In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

13. Restriction of Personal Data Processing

13.1 Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.

13.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

14. Data Portability

14.1 The Company processes personal data using automated means.

14.2 Where data subjects have given their consent to the Company to process their personal data in such a manner, or the processing is otherwise required for the performance of a contract between the Company and the data subject,

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data subjects have the right, under the GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).

14.3 All requests for copies of personal data shall be complied with within one month of the data subject's request. The period can be extended by up to two months in the case of complex or numerous requests. If such additional time is required, the data subject shall be informed.

15. Data Security - Transferring Personal Data and Communications

The Company shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

15.1 All emails containing personal data must be marked "confidential";

15.2 Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;

15.3 Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;

15.4 Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted;

15.5 Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient;

15.6 All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked "confidential";

16. Data Security - Storage

The Company shall ensure that the following measures are taken with respect to the storage of personal data:

16.1 All electronic copies of personal data should be stored securely using passwords;

16.2 All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;

16.3 All personal data stored electronically should be backed up daily; with backups stored offsite. All backups should be encrypted;

16.4 No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise;

16.5 No personal data should be transferred to any device personally belonging to an employee or other party working on behalf of the Company and personal data may only be transferred to devices belonging to other parties working on

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behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken);

17. **Data Security - Disposal**

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of.

18. **Data Security - Use of Personal Data**

The Company shall ensure that the following measures are taken with respect to the use of personal data:

18.1 No personal data may be shared informally and if an employee or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested from Nicki Bennison, Commercial Director;

18.2 Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees or other parties at any time;

18.3 If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;

19. **Data Security - IT Security**

The Company shall ensure that the following measures are taken with respect to IT and information security:

19.1 All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols;

19.2 Under no circumstances should any passwords be written down or shared between any employees or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;

19.3 All software (including, but not limited to, applications and operating systems) shall be kept up-to-date. The Company's IT staff shall be responsible for installing any and all security-related;

19.4 No software may be installed on any Company-owned computer or device without the prior approval of the Directors;

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20. Organisational Measures

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

20.1 All employees or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under Data Protection Law and under this Policy, and shall be provided with a copy of this Policy;

20.2 Only employees or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;

20.3 All sharing of personal data shall comply with the information provided to the relevant data subjects and, if required, the consent of such data subjects shall be obtained prior to the sharing of their personal data;

20.4 All employees or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;

20.5 All employees or other parties working on behalf of the Company handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;

20.6 Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;

20.7 All personal data held by the Company shall be reviewed periodically;

20.8 The performance of those employees or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;

20.9 All employees or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of Data Protection Law and this Policy by contract;

20.10 All agents working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and Data Protection Law;

21. Data Breach Notification

21.1 All personal data breaches must be reported immediately to the Company's Data Protection Officer.

21.2 If an employee or other party working on behalf of the Company becomes aware of or suspects that a personal data breach has occurred, they must not attempt to investigate it themselves. Any and all evidence relating to the personal data breach in question should be carefully retained.

21.3 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the

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Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

21.4 In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

21.5 Data breach notifications shall include the following information:

21.5.1 The categories and approximate number of data subjects concerned;

21.5.2 The categories and approximate number of personal data records concerned;

21.5.3 The likely consequences of the breach;

21.5.4 Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

22. Implementation of Policy

This Policy shall be deemed effective as of 25th May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: Simon Smith

Position: Managing Director

Date: 1st April 2021

Due for Review by: 1st January 2022

Signature: