

# FARNCOMBE CONSTRUCTION

CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

## Data Privacy Policy for Farncombe Smith 1990 LTD T/A Farncombe Construction

### Introduction

This data privacy policy document's how we use personal information relating to our employees, the supply chain partners we work for, and for those subcontractors who for us and those employed by our supply chain partners.

We are a Data Controller which means we must justify which personal information we use, how we use it and why we need to use it and for how long we will retain the information.

### Employee Data

#### Information we hold about our Employees

Detailed information about the personal data we hold about our employees is recorded in our GDPR audit, a summary is listed below:

- - Information held
- - Lawful basis for processing the data
- - Special Category Data
  - Name & Address – Legitimate Interests
  - Accreditations and Qualifications achieved – Legitimate Interests
  - Licence to work – Legitimate Interests
  - Personal Telephone Numbers - Legitimate Interests
  - Personal Email Addresses - Legitimate Interests
  - National Insurance Number - Legitimate Interests
  - Bank Account Details - Legitimate Interests
  - Driving Licences Detail's and any Unspent Convictions - Legitimate Interests
  - Declared Medical Conditions - Legitimate Interests
  - Safety Critical Worker (Fit for Task) Certificates – Legitimate Interests
  - Prohibited Substance Test Results - Legal Obligation
  - PPE Sizing (Clothing & Shoe Sizes) – Legal Obligation
  - Emergency Contact Details - Legitimate Interests
  - Images of Employees – Consent or Legitimate Interest depending upon usage
  - Remuneration including Pension – Legal Obligation
  - Date of Birth – Legitimate Interest

# FARNCOMBE CONSTRUCTION

## CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

### **How is your information collected?**

We collect our employees' personal information as part of the induction process for that employee. Name, address, age and contact details may be collected prior to this for the purposes of arranging an interview. We may also collect data from the following sources.

- DVLA – This will require you to “Share your Licence”
- DVSA – This will require your consent
- Industry Certification Boards and ATO's
- A previous employer – This will require your consent
- Medical Test Centres – This will require consent for a Medical Examination
- Prohibited Substances Testing - This will require consent for a Test to be administered

Your information may also be collected by a third party e.g. the main contractor in the supply chain. Please refer to the contractor in questions' Privacy Policy for further information.

### **Data Security**

We have in place appropriate measures to secure the information we hold and to reduce the opportunity for this information to be lost, stolen or misused in any way, information held may be stored by in digital and/or paper form. The digital documents will require a password to be opened and the paper documents will be kept secure. Access to this information will be limited to those who need to know for business reasons.

### **How your information is used/shared**

A Summary of how your information will be used or shared follows

- The information held (Excluding Driving Licence, Medical Conditions, PPE Sizing and Images of Employees) will be shared with our accountant who will process the information for Payroll and Taxation purposes only. The information will be stored on a password protected Laptop, within the Accountant's Payroll software which is password protected. The information will be transferred via email as a password protected & encrypted PDF.
- The Driving licence / Driver Card information will be shared with the DVSA and Fleet Check. It will also be shared with our insurance company if requested by the insurance company for the purpose of insurance only. The information will be held securely. Information will be transferred verbally, via online application, Secure email or the Fleet Check App. If written confirmation is required a password protected PDF will be sent via email.

# FARNCOMBE CONSTRUCTION

CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

- Employee contact details (Name & Address, Contact Telephone Numbers and Work Emails) may be shared with Farncombe Smith 1990 LTD's third-party contractor's and sub-contractors for enabling the completion of work we have been contracted to complete.
- Employee contact details (Name, work telephone/mobile number's and work email addresses) may be shared with our suppliers, main contractor's or the HSE where work related communication or monitoring is required.
- In case of an emergency requested information including Disclosed Medical Conditions deemed relevant will be disclosed to Medical Professionals using the best judgment of Employees.
- Where required to fulfil their duties employees must complete the appropriate training to achieve industry qualifications and be certified to carry out their tasks. If personal data is required, the information shared will be controlled and processed by the Training Company or Certification Board. As an employer will require employees to be enrolled on these training programmes and this will be discussed with each employee on an individual basis.

## Employee Images

Images of our Employees may be captured as part of day to day activities; these images may be shared with our contractors for the purposes of monitoring Quality Control and Promotion of the contractor as a supply chain partner. We will store and process images of our employees...

- Employees are free to consent or deny permission for the processing of personal images but may be required to carry out alternative work as instructed by the line manager should images of work undertaken be required for quality control purposes. [Consent](#) is required for the use of Employee's Images. **You have the right to withdraw consent at any time.**
- **Consent:** Employees will be required to complete an [Employee Media Release Form](#) to confirm or deny if they are allowing us to store, process and share work related images of its employees. They can also withdraw their consent using the same form. By agreeing and Signing the Media Release form an employee is agreeing to his image being stored on the Farncombe construction server and being used for the following
  - To promote Farncombe Smith 1990 LTD via its website and printed documents and for the promotion of Farncombe Smith 1990 LTD by its contractors for the mutual benefit of Farncombe Smith 1990 LTD and the contractor in question.

# FARNCOMBE CONSTRUCTION

CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

- Quality Control Pictures for process by Farncombe Smith 1990 LTD and to be shared with relevant Quality Control personnel for the quality control process Farncombe Smith 1990 LTD is required to provide as part of its contractual obligations and for its own Quality Control Purposes.
- Images will be collected by management and may be processed for our website alongside the employees Name, Position, Qualifications and contact details. If our Website is administered by another company only this information will be shared.
- Where Photos are required to complete a training requirement or for the employee's training card or certificate consent will not be required as it is in the legitimate interests of the employee to be trained and meet with the requirement(s) to carry out their duties on site and operate Machinery/Tools.

## **How we use Particularly Sensitive information about our Employees**

Particularly sensitive information is information that relates to an individual's Physical / Mental Health, Sexual Orientation, Faith, Race, Trade Unions, Political opinion's, alleged or Committed Offences.

The nature of sensitive information means it needs to be treated with greater care and there are additional conditions associated with this personal data. We will use particularly sensitive information in the following ways:

- Medical information relating to issues we need to be aware of for the welfare of the employee or other individuals or in the case of an emergency;
- Whether you present a risk due to the influence of drugs, alcohol or any other addiction;
- We may also be required to carry out a criminal record check should a work-related licence, contract or contractor require these checks to be made for the purpose of awarding a contract or granting/maintaining a licence awarded to us;
- For the purpose of verifying you have a legal right to work on our sites.

# FARNCOMBE CONSTRUCTION

## CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

### **Automated Decision Making**

We do not employ any automated decision-making processes.

### **How our Employees use Personal Data?**

Personal data is any information that can be used to identify/contact an individual. It is a breach of the GDPR for any employee to access or share another employee's Personal data without a justifiable lawful basis for doing so. However, it is justifiable to share information on the basis of there being a legitimate interest for doing so. Therefore, provided the information is necessary for the needs of completing the contract an employee may share the information.

### **Examples of sharing or not sharing another employee's data**

- Employee's may answer or reply to each other's Company Email or Company Mobile Telephones including voicemail only for the purpose of addressing the work-related issue at hand.
- Employees may view work related documents located in each other's server folders. Employees must not store unnecessary data on the server. Storing unnecessary personal data about themselves or another individual may constitute an act of Gross Misconduct in which case an investigation will be initiated in line with the Farncombe Smith 1990 LTD disciplinary procedure.
- Should a request for a reference relating to an employee be received the individual will be required to grant consent for the requested information to be released by another employee to the third-party.
- Employees may share another employee's personal data if there is a justifiable need/benefit given the current circumstance e.g. Medical emergency
- If an employee requires a reference the point of contact given should be the Data Controller rather than simply sharing the information. Information shared with other organisations that are not related to work need to be logged Requests will need to be submitted in writing via email or a letter.
- In the event that there is a legal requirement for Farncombe Smith 1990 LTD to disclose information relating to an employee the information will be disclosed, the employee will not be notified if legal obligations prevent the employee from being informed. Legal requests must be made in writing and verified. Legal requests must be documented and crossed checked against the procedures required by the GDPR.

# FARNCOMBE CONSTRUCTION

CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

## Data Retention

If an Employee leaves the organisation personal data which is not legally required to be held by will be deleted. If we have received consent to hold particular data this will be deleted if the Employee requests this data to be deleted. If the data is required for Quality control purposes this data will be retained but not shared unless required for the purposes of verifying Quality control.

## Non-Employee Personal Data

### Introduction

We work for and with a number of other organisations which we need to communicate with in an efficient way on a daily basis to fulfil contractual, Health and Safety and licencing obligations. The information we process will vary according to requirements imposed upon us by the contract in place.

### Contractors and Sub-Contractors data

### Information we may hold about our Sub-Contractor's & their Employees

Below is a list of the information our Contactor may request which we require to be submitted from our Sub-Contractors. Wherever possible we will suggest to the main contractor they contact the data subject directly and collect the data; if the data is to come from us then we will request the data.

- - Information held
- - Lawful basis for processing the data
- - Special Category Data
  - Name & Address – Legitimate Interests
  - Accreditations and Qualifications achieved – Legitimate Interests
  - Licence to work – Legitimate Interests
  - Personal Telephone Numbers - Legitimate Interests
  - Personal Email Addresses - Legitimate Interests
  - National Insurance Number - Legitimate Interests
  - Declared Medical Conditions - Legitimate Interests
  - Safety Critical Worker (Fit for Task) Certificates – Legitimate Interests
  - Emergency Contact Details - Legitimate Interests
  - Images of Personnel – Consent or Legitimate Interest depending upon usage
  - Date of Birth – Legitimate Interest
  - Company Bank Account Details – Legitimate Interests

# FARNCOMBE CONSTRUCTION

CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

## **How will the information be collected?**

If the request for personal data is made to us by the main contractor then the information will be collected from the employer of the individual as part of the daily business activities. The data requested will be requested via email and collected via email wherever possible. Stored and shared data must relate to the request received and the justification provided for the request must be valid in our opinion.

## **Data Security**

We have in place appropriate measures to secure the information we hold and to reduce the opportunity for this information to be lost, stolen or misused in an unauthorised way, information held will be stored by Farncombe Smith 1990 Ltd in the format it was sent to us on our system. We instruct our employees receiving personal data to ensure that the data is only stored and transferred in a secure manner although information that needs to be emailed or submitted via the internet is relying security that is out of our control.

## **How will the Personal Data be shared?**

The data received will only be shared with the contractor making the request and will be transferred using the same delivery method employed by the source of the information. If a Sub-Contractor fails to supply the information required to work the main contractor's site this may prevent the Sub-Contractor from accessing the site. Where a business sends us their account details for payment to be made via Bank Transfer the company's account details will be shared with our accountant in a secure fashion for the purposes of payment.

## **How we share Particularly Sensitive information about our Sub-Contractors**

Sensitive information received to fulfil a request will be sent to the contractor making the request and then removed from our system unless there is a legal or health and safety justification for us to retain the information once the original request has been fulfilled.

## **Data Retention**

Personal data which is not legally required to be held or not required for quality control will be deleted. If we have received consent to hold particular data this will be deleted if the Employee

# FARNCOMBE CONSTRUCTION

## CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

requests this data to be deleted. If the data is required for Quality control purposes this data will be retained but not shared unless required for the purposes of verifying Quality control. Data which is no longer required will be deleted.

### **Automated Decision Making**

We do not employ any automated decision-making processes.

### **Data Subject's Rights of Access, Correction, Erasure and Restriction**

Where the law permits, it grants you the following rights

- As a Data Subject you have a right of access to a copy of the information about you we collect, process and store, and an explanation of our lawful justification for holding it.
- You have the right to have inaccurate data about you corrected.
- You have the right to request erasure of your personal data unless there is a justifiable lawful basis for us retaining this data.
- You have the right to object/restrict to the processing of your personal data unless there is a justifiable lawful basis for us retaining/processing this data.
- You have the right to request the transfer of your personal information to a third party.

### **Right to withdraw consent**

If you have provided consent to us for holding personal Data about you then it is your right to withdraw this consent at any time, please contact us in writing and your data will be disposed of in a secure manner. Where the information is required for accessing a site you will no longer be granted access.



# FARNCOMBE CONSTRUCTION

CIVIL ENGINEERS AND GROUNDWORK CONTRACTORS

Bowenhurst Farm, Bowenhurst Lane, Off Mill Lane, Crondall, Farnham, GU10 5RP  
Tel: 01252 851969

[www.farncombeconstruction.co.uk](http://www.farncombeconstruction.co.uk)

Email: [info@farncombeconstruction.co.uk](mailto:info@farncombeconstruction.co.uk)

## Data Controller

The responsibility for Data Privacy rests with senior management and we will ensure that this policy is pursued through the organisation. We will take all reasonably practicable precautions to ensure privacy of data being held about an individual is in line with the GDPR.

This Data Privacy Policy is will be updated as required please check back periodically to check for any changes

Should you wish to see any of the information relating to you please contact [Farncombe Smith 1990 LTD's Data Controller](#). It is your right to request and view data relating to you. If you want an explanation of our justification for processing any of the information about you this will be explained to you as well. The information will be made available to you in an accessible format and within a reasonable time of being requested.

- You can contact Farncombe Smith 1990 LTD Data Controller via any of the following methods
  - In person at the Office Address
  - In writing at the Office address
  - Via email to [Dominic@FarncombeConstruction.co.uk](mailto:Dominic@FarncombeConstruction.co.uk)
  - Via Telephone on 01252851969 or 07769584888

If any Individual feels there is a problem with the way Farncombe Smith 1990 Ltd is handling their data they have a right to complain to the ICO (Information Commissioner's Office). Contact details can be found by following this link: [ICO-Report a concern](#). It would be appreciated if we were given the chance to address your concerns prior to approaching the ICO.

Signed: *R. Farncombe Smith*

Date: 1<sup>st</sup> July 2020

**Rod Farncombe-Smith**  
**Director**