

## Evans Electrical Ltd

### Suppliers and Sub Contractors Privacy Notice

#### 1. Supply Chain Privacy Notice

Evans Electrical Ltd (“We” and “Us”) are committed to protecting and respecting privacy.

#### 2. What Is A Privacy Policy?

This Privacy Policy is about how we use personal information relating to the employees and workers of our suppliers and sub-contractors working with us. We operate a separate Privacy Policy in relation to the way that we use information about our employees.

We are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you and to make you aware of how and why your personal data will be used for the purposes of the recruitment exercise, and how long it will usually be retained for.

#### 3. The Information We Hold About You

We will collect, store, and use the following categories of personal information about you:

- Personal details, including name, title, address, telephone number, email address, date of birth, gender, employment history, qualifications;
- Site induction and training history;
- Professional/ Occupational Qualifications;
- Next of kin details and emergency contact information;
- Disciplinary cards; and
- Information about your right to work in the United Kingdom.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness record;
- Drug and alcohol results data, if appropriate; and
- Information about criminal convictions and offences (if relevant to the contract you are working on).

#### 4. How Is Your Information Is Collected?

We collect personal information about you from the following sources:

- You, including sometimes via our “personal details and health questionnaire” form;
- Your employer;
- The Disclosure and Barring Service, if appropriate; and
- Third party drug and alcohol testing services, if appropriate.

#### 5. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **6. How We Will Use Your Information**

We will use the personal information we collect about you:

- to meet our obligations to you under our contract with you, for example to pay for services rendered / goods provided and to send you remittance advice electronically or otherwise;
- to meet our obligations under law (e.g. by providing information to HMRC and/or the Health and Safety Executive;
- to ensure that you have the right skills, training and qualifications to comply with relevant regulatory requirements and standards for the works;
- for health and safety and monitoring of performance purposes;
- for safeguarding purposes and to achieve the aims of our Modern Slavery Policy;
- to verify that you have the legal right to work on our sites or provide services on our behalf

We are allowed to process this information about you because it is in our legitimate interests to protect the health, safety and vital interests of you and others. We also need to process your personal information to ensure the efficient operation of our sites and services.

## **7. If You Do Not Provide Information**

If you do not provide information when requested, it may be necessary for us to exclude you from site and (if applicable) to inform your employer.

## **8. How We Use Particularly Sensitive Personal Information**

We will use your particularly sensitive personal information in the following ways:

- Medical Issues that we should be aware of which may affect the safety of you or others, or which may affect how we respond to an emergency;
- Whether you present a risk due to an impairment through drugs or alcohol;
- We may also be required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular if:
  - we are legally required by a regulatory body to carry out criminal record checks in connection with a contract or service that you are working on;
  - the role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) and is also specified in the Police Act 1997 (Criminal Records) Regulations (SI 2002/233) so is eligible for a standard or enhanced check from the Disclosure and Barring Service;
- For safeguarding purposes and to achieve the aims of our Modern Slavery Policy; and

- To verify that you have the legal right to work on our sites or provide services on our behalf.

### **9. Automated Decision-Making**

You will not be subject to decisions based on automated decision-making.

### **10. Data Sharing**

*Why might you share my personal information with third parties?*

We will only share your personal information with the following third parties:

- Where required because of a legal obligation (e.g. the Health & Safety Executive and HMRC)
- Your employer;
- Third party service providers (e.g. software hosting providers);
- Our Clients / Customers where they need it for the purposes outlined in sections 6 and 7;
- Our training providers for the purposes of arranging any training we may organise which you are required to attend
- Our online bookkeeping and invoice processing providers and our bank for the purposes of processing and paying your invoices and communicating remittance advice.

We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **13. Where is the information stored?**

The information referred to in this notice is stored on our business server, which is subject to protection by our IT services provider. All of the information sits behind a firewall and subject to security provided by our IT service provider. Contact information and information regarding qualifications are available to all office staff and all of our Contracts Managers that have access to our general office server. However, any sensitive personal information and financial information is held on a dedicated financial server with access available only to our Administrative Team.

If you are a sub-contractor of ours, hard copies of all of the above information is also stored in hard copy in our sub-contractor file which is retained in a locked filing cabinet at our head office and looked after by the Administrative Team, who are the only ones with access to it.

Information that was provided to us regarding your contact details, emergency contact information, qualifications and your medical and health information are also held in hard copy format in the health and safety file (commonly referred to as the "Red Pack") for the project(s) on which you are working for time to time. These files are retained by the Site Supervisor for the project(s), will be stored in the site office (which should be locked when the site supervisor is not present) until completion of the project, at which point it will be transferred to head office and kept in our store room.

### **11. Data Retention**

We will retain your personal information in accordance with our legal and contractual requirements under our agreements (typically our liability under our contracts extends for 12 years following project completion) and in accordance with the requirements of health and safety legislation.

### **12. Rights Of Access, Correction, Erasure, And Restriction**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Administrative Team in writing, whose details are provided below.

### **13. Additional Information**

If you talk to us over the Internet (for example by email or webmail) remember that this form of communication is not always secure. These kinds of messages may go through a number of countries before they are delivered. That is just the nature of the Internet, so we cannot accept responsibility for any unauthorised access or loss of personal information if it is beyond our control.

### **14. Queries and Complaints**

If you have any questions about this Privacy Notice or how we handle your personal information, please contact the Administrative Team, Evans Electrical Ltd, 59 Waterloo Road, Cardiff CF23 9BL, or email [info@evanselectricaltd.co.uk](mailto:info@evanselectricaltd.co.uk).

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please consider contacting us in first instance.

Any changes we make to this Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see if there have been any updates or changes to our privacy policy.

This policy was last updated on 25<sup>th</sup> May 2018.