

A photograph of three men in an office setting. The man in the center, wearing a white shirt, is leaning over a table and pointing at a large architectural plan with a red pen. To his left, a man with a beard wearing a dark jacket is looking at the plan. To his right, another man in a dark sweater is also looking at the plan. In the background, there are white shelves displaying several framed certificates and awards. One certificate prominently features the '250' logo. The overall scene suggests a professional meeting or collaborative work environment.

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PRIVACY POLICY

Readie Construction Ltd
Policy Statement - June 2022

PRIVACY POLICY

DATA PROTECTION Subject Access Request policy

1. INTRODUCTION

Readie Construction Limited ('RCL' or 'we') has created this policy to outline how we will deal with subject access requests in line with our commitment to complying with the General Data Protection Regulation (GDPR). RCL will approach compliance with the GDPR in a positive way and handle any request fairly and transparently.

2. WHO DOES THIS POLICY APPLY TO?

This policy applies to all employees and other workers. For the purpose of this policy, other workers shall include non-executive directors, workers (including temporary and agency workers), secondees, interns, independent contractors and consultants, professional advisers, other third parties engaged by RCL to carry out work for us and who have access to our internal systems. This categorisation does not demonstrate a particular status.

3. WHAT DOES THIS POLICY COVER?

This policy covers your rights to access the personal data that we process and hold about you and the steps you need to take if you would like to access it.

4. WHAT PERSONAL DATA ARE YOU ENTITLED TO?

- In summary, you have the right to obtain;
 - confirmation that your personal data is being processed;
 - access to your personal data; and
 - access to any other information referred to in our Employee Privacy Notice.

5. WHAT IS PERSONAL DATA?

The Personal Data we process is set out in detail in the Privacy Notice issued to you. For example, identification data, contact details and your employment details.

6. MAKING A SUBJECT ACCESS REQUEST?

- A subject access request must be made in writing addressed to our Data Protection Lead enclosing identification documentation (passport / driving licence etc.).
- If you are unable to make a written request by reason of disability we will make an exception to this rule and treat an oral request as a valid subject access request.

7. CAN ANOTHER PERSON MAKE A REQUEST ON MY BEHALF?

- Yes, you are entitled to ask someone else to make a request on your behalf (providing we are satisfied that the requesting party has appropriate authority from you to make the request).
- Unless we are confident that you wish us to respond to the party making the request on your behalf, we will always respond directly to you.



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8. DO YOU NEED TO PAY A FEE?

- As a general rule, no fees are payable.
- However, if a request is made for further copies of documents that have already been provided a reasonable administrative fee may be charged for the provision of further copies.
- In the event that we receive an obviously vexatious request we do have an additional discretion to either refuse the request or charge a reasonable administrative fee. Such a decision will be made on a case by case basis at senior management level.

9. WHEN CAN YOU EXPECT TO RECEIVE A RESPONSE?

- RCL will respond to your request within one month.
- Where a request is particularly complex or onerous RCL may extend this period by up to two months but this will be the exception rather than the rule. Any decision to extend the time for responding will be taken on a case by case basis at a senior management level.
- To ensure that we are able to respond to requests as efficiently as possible and within the statutory time limit we ask that you assist us by specifying the personal data that you wish to access and provide us with any information we request to assist us in our search for and the requested data.

10. WHAT INFORMATION WILL RCL ACTUALLY DISCLOSE IN RESPONSE TO A SUBJECT ACCESS REQUEST?

- A subject access request only entitles you to receive details of the personal data that we hold about you. We will determine what is or is not personal data in accordance with guidance issued by the Information Commissioners Office (ICO) (a quick reference guide can be found at ico.org.uk) and our Employee Privacy Notice. Any decision to disclose non personal data in response to a subject access request will be entirely discretionary.
- RCL can refuse to act on a request (or part of it) if we find, and can demonstrate, that your request is manifestly unfounded or excessive, for instance, if you have made repetitive requests or requests for irrelevant or inappropriate data. Whether RCL perceives a request to be manifestly unfounded or excessive will be decided on a case by case basis taking into account all of the relevant circumstances. If RCL refuses to act on a request, we will write to you setting out our reasons for doing so.
- Before responding to a subject access request we will always review the personal data and redact or delete anything which includes personal data about another person who can be identified from the data (unless they have consented to its disclosure and we can consider it is reasonable for it to be disclosed in the circumstances) and any information which is withheld subject to an exemption under the GDPR.

11. WHAT ARE THE EXEMPTIONS UNDER THE GDPR?

There are a number of exemptions set out in the GDPR which RCL may rely on to refuse disclosure of some or all personal data under a subject access request. A full list of these can be found in the GDPR itself but examples of exemptions that we may rely on include: disclosures that may prejudice a criminal investigation; information produced in the course of taking legal advice or pursuing or defending proceedings; confidential employment references; information produced for our management forecasting purposes; and disclosures that may prejudice ongoing negotiations.



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12. CONTACT DETAILS FOR SUBJECT ACCESS REQUESTS

Please send your subject access request to:

CLAIRE TRUNDLE
READIE CONSTRUCTION LIMITED
UNIT 18 FALCON BUSINESS CENTRE, ASHTON ROAD,
ROMFORD, RM3 8UR

CLAIRE.TRUNDLE@READIECONSTRUCTION.CO.UK

It will help us deal with your request promptly if you clearly mark it as a subject access request.

Any staff member receiving a mis-directed subject access request must immediately forward it on to Claire Trundle.

DATA RETENTION POLICY – EMPLOYMENT RECORDS

1. ABOUT THIS POLICY

- This policy supports the Data Protection Policy and Privacy Notices of Readie Construction Limited ('RCL') and adopts the definitions used in those policies.
- The policy is intended to ensure that RCL processes personal data in the form of employment records in accordance with the personal data protection principles, in particular that:
 - Personal data must be collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes.
 - Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. When personal data is no longer needed for specified purposes, it is deleted or anonymised as provided by this policy.
 - Personal data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.
 - Personal Data must not be kept in an identifiable form for longer than is necessary for the purposes for which the data is processed.
 - Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful processing, and against accidental loss, destruction or damage.
- The Data Protection Officer (DPO) is responsible for overseeing this policy. Any questions about the operation of the policy should be submitted to the DPO.

2. LOCATION OF EMPLOYMENT RECORDS

RCL's MHR holds employment records and the HR Department can be contacted with any enquiries relating to your personal data.

3. KEEPING INFORMATION UP TO DATE

- RCL needs to ensure that your personal details are up to date and accurate.



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- When you first start working for RCL we record your name, address, next of kin and contact details. In the event that any of these change you should update your details on MHR or inform the HR department. You will be invited to review and update personal information on a regular basis.
- These provisions are intended to complement the data subject rights referred to in the Data Subject Access Request policy.

4. GENERAL PRINCIPLES ON RETENTION AND ERASURE

- RCL's approach to retaining employment records is to ensure that it complies with the data protection principles referred to in this policy and, in particular, to ensure that:
 - Employment records are regularly reviewed to ensure that they remain adequate, relevant and limited to what is necessary to facilitate you working for RCL.
 - Employment records are kept secure and are protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Where appropriate RCL uses anonymization to prevent identification of individuals.
 - When records are destroyed, whether held as paper records or in electronic format, RCL will ensure that they are safely and permanently erased.

5. RETENTION AND ERASURE OF RECRUITMENT DOCUMENTS

- RCL retains personal information following recruitment exercises to demonstrate, if required, that candidates have not been discriminated against on prohibited grounds and that recruitment exercises are conducted in a fair and transparent way.
- RCL's Candidate Privacy Notice advises candidates how long we expect to keep their personal information for, once a recruitment decision has been communicated to them. This is likely to be for nine months from the communication of the outcome of the recruitment exercise which takes account of both the time limit to bring claims and for claims to be received by RCL.
- Information relating to successful candidates will be transferred to their employment record with RCL. This will be limited to that information necessary for the working relationship and, where applicable, that required by law.
- Following a recruitment exercise, information in both paper and electronic form, will be held by MHR. Destruction of that information will take place in accordance with this policy.

6. RETENTION AND ERASURE OF EMPLOYMENT RECORDS

RCL has regard to recommended retention periods for particular employment records set out in legislation, referred to in the table below. However, it also has regard to legal risk and may keep records for up to seven years (and in some instances longer) after your employment or work with us has ended.

These must be kept for at least three years after the end of the tax year to which they relate. However, given their potential relevance to pay disputes they will be retained for seven years after employment ends.



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Type of employment record	Retention period
<p>Recruitment records, these may include: Completed online application forms or CVs.</p> <p>Equal opportunities monitoring forms.</p> <p>Assessment exercises or tests.</p> <p>Notes from interviews and short-listing exercises.</p> <p>Pre-employment verification of details provided by the successful candidate. For example, checking qualifications and taking up references. (These may be transferred to a successful candidate's employment file.)</p> <p>Criminal records checks. (These may be transferred to a successful candidate's employment file if they are relevant to the ongoing relationship.)</p>	<p>Nine months after notifying candidates of the outcome of the recruitment exercise.</p> <p>Consent must be given by the candidate if RCL want to keep the application for a longer period.</p> <p>References will not be retained following the commencement of employment if RCL deems the references satisfactory.</p>
Immigration checks	Three years after the termination of employment.
<p>Contracts, these may include:</p> <p>Written particulars of employment.</p> <p>Contracts of employment or other contracts.</p> <p>Documented changes to terms and conditions.</p>	While employment continues and for seven years after the contract ends.
<p>Payroll and wage records, including: Details on overtime.</p> <p>Bonuses.</p> <p>Expenses.</p> <p>Benefits in kind.</p>	These must be kept for at least three years after the end of the tax year to which they relate. However, given their potential relevance to pay disputes they will be retained for seven years after employment ends.
Current bank details	Bank details will be deleted as soon after the end of employment as possible once final payments have been made.

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Type of employment record	Retention period
PAYE records	
Payroll and wage records for companies	These must be kept for six years from the financial year-end in which payments were made. However, given their potential relevance to pay disputes they will be retained for seven years after employment ends.
Records in relation to hours worked and payments made to workers	These must be kept for three years beginning with the day on which the pay reference period immediately following that to which they relate ends. However, given their potential relevance to pay disputes they will be retained for seven years after the working relationship ends.
Travel and subsistence	While employment continues and for seven years after employment ends.
Record of advances for season tickets and loans to employees	While employment continues and for seven years after employment ends.
<p>Personnel records, these include: Qualifications/references.</p> <p>Consents for the processing of special categories of personal data.</p> <p>Absence records.</p> <p>Annual leave records.</p> <p>Annual assessment reports.</p> <p>Disciplinary procedures.</p> <p>Grievance procedures.</p> <p>Death benefit nomination and revocation forms.</p> <p>Resignation, termination and retirement.</p> <p>Sickness records.</p> <p>Statutory sickness records.</p>	While employment continues and for seven years after employment ends.
Working time opt-out forms	Three years from the date on which they were entered into.
Type of employment record	Retention period



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Records to show compliance with the Working Time Regulations 1998, including: Time sheets for opted-out workers. Health assessment records for night workers.	Three years after the relevant period.
Maternity records, these include: Maternity payments. Dates of maternity leave. Period without maternity payment. Maternity certificates showing the expected week of confinement.	Four years after the end of the tax year in which the maternity pay period ends.
Accident records (These are created regarding any reportable accident, death or injury in connection with work.)	For at least four years from the date the report was made.
Settlement Agreement	Seven years after the date of the agreement. This period will be extended in line with the terms of the agreement if necessary.

7. CHANGES TO THIS POLICY

We reserve the right to update this policy at any time, and we will provide you with a new policy when we make any substantial updates.

CANDIDATE PRIVACY NOTICE

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

- Readie Construction Limited ('RCL' or 'we') is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.
- You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

2. DATA PROTECTION PRINCIPLES

- We will comply with data protection law and principles, which means that your data will be:
 - used lawfully, fairly and in a transparent way;
 - collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;



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- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

3. WHAT INFORMATION DO WE HOLD ABOUT YOU?

- In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:
 - the information you have provided to us in your curriculum vitae and covering letter;
 - the information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, and qualifications;
 - any information you provide to us during an interview; and
 - your test scores (as appropriate).
- We may also collect, store and use the following “special categories” of more sensitive personal information:
 - information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
 - information about your health, including any medical condition, health and sickness records; and
 - information about criminal convictions and offences.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

- We collect personal information about candidates from the following sources:
 - you, the candidate;
 - RCL’s appointed recruitment providers, from which we collect the following categories of data: information you have provided in your curriculum vitae and covering letter or provided on our application form;
 - RCL’s background check provider, from which we collect the following categories of data: information about your criminal convictions, credit history and education verification as appropriate for the role; and
 - your named referees.

5. HOW WILL WE USE INFORMATION ABOUT YOU?

- We will use the personal information we collect about you to;
 - assess your skills, qualifications, and suitability for the role;
 - carry out background and reference checks, where applicable;
 - communicate with you about the recruitment process;
 - keep records related to our hiring processes; and
 - comply with legal or regulatory requirements.
- It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role.
- We also need to process your personal information to decide whether to enter into a contract of employment with you.
- Having received your CV and covering letter or your application form and your test results (if applicable) we will then process that information to decide whether you meet the basic



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requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role.

- If we decide to offer you the role, we may take up references before confirming your appointment.
- **If you fail to provide information when requested**, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

6. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

- We will use your particularly sensitive personal information in the following ways;
 - we will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview; and
 - we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

7. INFORMATION ABOUT CRIMINAL CONVICTIONS

We do not envisage that we will process information about criminal convictions.

8. AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

9. DATA SHARING

- We do not envisage having to share your information with any third parties, save for any recruitment company through which you have been placed.
- We will ensure that all our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. 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.

10. 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 have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.



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11. DATA RETENTION

- How long will you use my information for?
 - We will retain your personal information for a period of five months after we have communicated to you our decision about whether to appoint you to role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.
 - If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

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.

13. 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, Claire Trundle (Head of HR) at claire.trundle@readieconstruction.co.uk

14. RIGHT TO WITHDRAW CONSENT

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact Claire Trundle (Head of HR) at claire.trundle@readieconstruction.co.uk. Once we have received notification that you have



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withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

15. DATA PROTECTION LEAD

We have appointed a data protection lead (DPL) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPL. 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.

PRIVACY NOTICE FOR EMPLOYEES, WORKERS AND CONTRACTORS

1. DOES THIS NOTICE APPLY TO YOU?

- This Employee Privacy Notice applies to all employees and other workers. For the purpose of this notice, other workers shall include non-executive directors, workers (including temporary and agency workers), secondees, interns, independent contractors and consultants, professional advisors, other third parties engaged by Readie Construction Limited ('RCL' or 'we') to carry out work for us and who have access to our internal systems. This categorisation does not demonstrate a particular status.
- It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such data.

2. WHAT DOES THIS NOTICE COVER?

- This privacy notice describes how we collect and use personal data about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).
- RCL is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

3. DATA PROTECTION PRINCIPLES

- The personal information we hold about you must be;
 - used lawfully, fairly and in a transparent way;
 - collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
 - relevant to the purposes we have told you about and limited only to those purposes;
 - accurate and kept up to date;
 - kept only as long as necessary for the purposes we have told you about; and
 - kept securely.

4. The type of information we hold about you

- In the course of your employment or work at RCL we may process personal data about you and your dependants, beneficiaries and other individuals whose personal information has been provided to us. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).



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- The types of personal information we will collect, store, and use includes, but is not limited to the following categories;
 - identification data, for example, your name, photograph, gender, date of birth, employee or payroll number;
 - contact details, for example, your home address, personal telephone numbers and email addresses, emergency and/or next of kin contact details;
 - employment details, for example, your job title/position, grade, status (e.g. contractor, full-time employee, part-time employee), reporting line and manager, employee number, start date, place or places of work (or, in some cases, your home address), business unit / division, records of time spent on tasks, employment contract, performance, appraisal and disciplinary records (including disciplinary issues you have been involved in), training and career development records, records of any grievance procedure you have initiated or been involved in, information on holiday/annual leave requested and taken, information on any other type of leave requested and taken (including maternity / paternity / adoption leave, parental leave, sabbaticals etc.), sickness records and information relating to the termination of your employment (if applicable);
 - information on professional qualifications, previous employment, achievements and/or skills, for example, information comprising or contained in CV/resume, application forms and/or reference requests (and responses). This will also include any authorisations required in respect of your work, for example, evidence that you hold a particular category of driving licence, Disclosure and Barring Service ("DBS")(or equivalent) checking applications and responses and/or membership of a particular professional body;
 - national or other identification documents, for example, your national ID/passport, "right to work" details, details of any visa applications, driver's licence, NHS number and national insurance number (or equivalent) and supporting documents where relevant (e.g. utility bill, bank statement, birth certificate etc.);
 - spouse or partner and dependents' information, for example, names, ages and contact details. In some circumstances, we may be required to process information on the health of your spouse / partner and dependants for the purposes of insurance benefits in place;
 - financial information, for example, bank account details, your tax code, PAYE and other tax information and information on payments to you from RCL, including payment of salary, bonus, overtime and other variable pay elements, expenses, benefits (e.g. information on pension entitlement, life assurance, share option / share scheme, private medical insurance etc.) and company allowances, information provided in response to credit checks;
 - other information necessary for administering payments to or from you, for example, information on any loans to you, on contributions made before or through payment of salary (for example, for trade union membership fees), deductions from payments to you and on any attachments to your earnings;
 - information relating to your use of RCL's systems, devices and property, for example, your computer and/or mobile or other device ID, mobile and direct dial phone numbers, user ID, IP addresses, log files, software and hardware inventories, cookies, information on access to RCL premises and CCTV footage;



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- information relating to travel and accommodation undertaken / used for work purposes;
- information provided in response to any engagement survey (e.g. your views on salary, benefits etc.);
- information relating to relevant external business and other interests (e.g. trusteeships and directorships); and
- information relating to your previous and/or prospective employer.
- There are “special categories” of more sensitive personal data which require a higher level of protection. We may also collect, store and use the following “special categories” of more sensitive personal information, for example:
 - we may request, on a voluntary disclosure basis, certain sensitive personal information such as information about your racial/ethnic origin, gender and health conditions which may be required to comply with anti-discrimination laws and government reporting obligations, and which we may use to help ensure equal employment opportunities;
 - you may be required, and/or opt to provide us with information about your physical or mental health so that we can monitor absence, consider your fitness to work, consider and provide work-related accommodations or adjustments, help to process claims under any applicable insurance schemes and/or to comply with our obligations in respect of health and safety at work;
 - we may process information relating to “live” criminal prosecutions as a part of DBS (or equivalent criminal records) checks and you may be required to provide information relating to any threatened or actual criminal proceedings or convictions to the extent that they affect your employment;
 - you may provide information on your membership of or affiliation to any trade union, to allow the Company to effect payment of any membership fee through payroll and/or as may otherwise be relevant to your employment; and/or
 - you may voluntarily provide other sensitive personal information to RCL (including to your colleagues / other RCL employees or workers) in the course of your work.

5. How is your personal information collected?

- We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We will collect additional personal information in the course of job-related activities throughout the period of you working for us. The following are the types of information we may collect about you and the source of information:
 - information about any “live” criminal proceedings collected from the DBS and/or equivalent criminal record checking bodies;
 - information about your previous employment (including your employment record) and other information about your suitability to work at RCL from any referee provided by you and/or from our third party recruitment agency partners;
 - information about your health including your fitness to carry out work and/or any accommodation or adjustments from your GP, other specialist medical adviser or RCL’s appointed medical expert; and
 - information about your entitlement to participate in, or receive payments or benefits under, any insurance or pension scheme provided by RCL, from the relevant benefit provider or its appointed agent.



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6. How we will use information about you?

- RCL will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances;
 - where it is needed to perform the contract we have entered into with you;
 - where we need to comply with a legal obligation; and
 - where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- We may also use your personal information in the following situations, which are likely to be rare;
 - where we need to protect your interests (or someone else's interests); and/or
 - where it is needed in the public interest or for official purposes.

7. Situations in which we will use your personal information

- We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below;
 - your CV and other back ground information: to consider your recruitment;
 - your employment contract and disciplinary, grievance, performance, appraisal, attendance and other employment records: to manage your employment with us;
 - your financial information: so that we can pay you and administer other benefits;
 - your health information: for the purposes set out above – including to monitor your sickness;
 - details of your dependants: for your emergency contact and benefits purposes; and
 - details you provide in response to employee engagement surveys: to monitor and address issues and ensure employees are valued.
- We may also collect and use personal information when it is necessary for other legitimate purposes, such as;
 - to help us conduct our business more effectively and efficiently, for example, for IT security/management, accounting, budgeting and forecasting, customer service, legal and compliance or financial planning purposes; and
 - to investigate potential breaches of legal obligations on us or our employee and workers and/or of our internal policies – whether by you or anyone else. For instance, we may monitor your browsing or communications activity or location when using RCL's devices or systems, if we suspect that you have been involved in phishing scams, fraudulent activity or activities in competition with or inconsistent with your work for RCL.
- We may use your personal and sensitive information where we have obtained your consent to do so. For example, where we consider it would be helpful to instruct a medical professional to prepare a report on your health during a period of absence or following your development of a condition, we may request that you provide your consent. Where we seek your consent, you will always have an opportunity to refuse.
- RCL may also use your personal information where we consider it necessary for complying with laws and regulations, including collecting and disclosing your personal and sensitive personal information as required by law (e.g. for compliance with tax, health and safety



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and anti-discrimination laws), under judicial authorisation, or to exercise or defend the legal rights of RCL and/or any other companies in its group.

- In limited circumstances, it may be necessary to use your personal and sensitive personal information to protect your vital interest – for example, if you are incapacitated at work and we need to arrange for emergency medical treatment.
- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

8. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

9. Change of purpose

- We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10. How we use particularly sensitive personal information

- “Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances;
 - in limited circumstances, with your explicit written consent;
 - where we need to carry out our legal obligations or exercise rights in connection with employment;
 - where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme; and
 - less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

11. Our obligations as an employer

- We will use your particularly sensitive personal information in the following ways;
 - we will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws;
 - we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits; and



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- we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

12. Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

13. Information about criminal convictions

- We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.
- Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.
- We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

14. Automated decision-making

- Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances;
 - where we have notified you of the decision and given you 21 days to request a reconsideration; and
 - where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.
- If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.
- You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.
- We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.



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15. Data sharing

- RCL takes care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this notice.
- We will share your personal information with other members of RCL's group of companies to administer HR and payroll systems as well as for other legitimate business purposes (including those referred to in paragraph 7 above).
- We make certain personal information available to third parties who provide services to us. We do this on a "need to know basis" and in accordance with applicable data privacy law. For example, some personal information will be available to third party companies who provide us with services such as;
 - MHR who provide our HR platform and assist with HR and other data systems and storage;
 - local payroll, benefits, employee travel management, sales tracking and expenses reporting providers/advisors retained by RCL from time to time (including Concur) – who help us to process payments to and administer benefits for you, to ensure that appropriate tax is deducted and shared with or otherwise paid to the relevant tax authorities;
 - MHR – who assist us to analyse, visualise and administer HR data, who also help to collect data in response to employee engagement surveys;
 - trade unions and/or other local employee representative groups – who are sometimes involved in employee engagement and bargaining;
 - legal, financial, benchmarking or market research and other third party advisors retained from time to time;
 - Organisations who assist in maintaining and updating our systems (including general software/IT troubleshooting).
 - occupational health advisers;
 - local criminal records checking agencies; and
 - our insurance providers or their appointed agents.

16. WHEN MIGHT YOU SHARE MY PERSONAL INFORMATION WITH OTHER ENTITIES IN THE GROUP?

- We may also disclose personal information to other third parties on other lawful grounds, including;
 - to comply with our legal obligations, including where necessary to abide by law or to respond to a court order. Examples might include where we are obliged to provide information on you, or information on you is requested by a relevant data protection, health and safety, tax and/or law enforcement authority;
 - with your consent, for example, where we seek your consent to the preparation of a medical report on you;
 - as necessary to establish, exercise or defend against potential, threatened or actual litigation (for example, if a former colleague names you in connection with tribunal or court proceedings concerning RCL);
 - where necessary to protect the vital interest of you or another person; and
 - in connection with the sale, assignment or other transfer of all or part of our business.



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17. What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

18. Transferring information outside the EU

- We do not envisage that we will need to transfer any personal data outside of the EU. However, if we do we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws and legislation.

19. Data security

- We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 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 have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

20. How long will you use my information for?

- We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For further information please refer to our Data Retention Policy.
- In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with the applicable laws and regulations.

21. your duties

- Your duty to inform us of changes.
- It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.



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22. YOUR RIGHTS

- 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.
- RCL will be the data controller in respect of the personal information referred to in this policy. If you have any questions about your data subject rights or wish to make a request to exercise them in relation to personal information referred to in this policy, you should make a request (where possible, clearly labelled as such) in writing to RCL’s Data Protection Lead, Claire Trundle by email to claire.trundle@readieconstruction.co.uk.

23. No fee usually required

- You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.
- Alternatively, we may refuse to comply with the request in such circumstances, for example;
 - we may request identification documents to verify that the request is made by you or on your behalf;
 - we may decline to act on any request which is deemed excessive and/or manifestly unfounded (for example, where repeated requests have been made). If RCL is prepared to act on such a request anyway, it may charge a reasonable fee; and/or
 - where a request is particularly complex, we may be unable to fully respond within the usual time limit, which is one month of receipt of the request, and may need to extend the time period by up to a further two months.



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24. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

25. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Claire Trundle. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

26. Data protection LEAD

We have appointed Claire Trundle, Head of HR, as our data protection lead (DPL) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPL. 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.

27. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Stuart Read
Executive Chairman
01st June 2022

*This policy statement is subject to annual review. It will only be published when materials changes occur.



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