



DATA SUBJECT PRIVACY NOTICE

BACKGROUND AND PURPOSE

Deeley Group Limited (Company number 01293493) (“we”) provide property investment, development and construction services. This Privacy Notice covers how we collect, use, store and disclose the data that you supply to us and your rights to access, amend and remove data that we hold about you. We are committed to protecting the privacy and security of your personal information and we will always treat you and your data with the respect you deserve.

This notice applies to current and former Suppliers, Clients and Sub-Contractors. This notice does not form part of any contract to provide services.

THE INFORMATION WE COLLECT FROM YOU

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

1. Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
2. Company registration numbers
3. National Insurance numbers
4. Bank account details.
5. HMRC VAT, UTR and tax status information
6. Location of employment or workplace.
7. Insurance Cover
8. Qualifications and professional body subscriptions
9. CCTV footage and other information obtained through electronic means such as biometric records.
10. Photographs.

How the information is collected

We collect information on Suppliers, Clients and Sub-contractors through the tendering process, either directly from the data subject or sometimes from a third party, e.g. Architect, Project Manager or background check provider. We may sometimes collect additional information from third parties including credit reference agencies or other background check agencies. We may collect additional personal information in the course of job-related activities throughout the period of you working for us or us working for you.

When we will use your personal information

We need all the categories of information identified above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your 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 information are identified below.

Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Purpose	Type of data	Lawful basis
Procurement of services	1, 2, 3, 5, 7, 8	Article 6(1)A Consent
Checking you are legally entitled to trade in the UK.	1, 2, 3, 5, 7	Article 6(1)C Legal Obligation

Paying you and, if you are a Sub-Contractor, deducting tax when required.	1, 2, 3, 4, 5	Article 6(1)C Legal Obligation
Administering the contract we have entered into with you.	1, 2, 3, 4, 5, 6, 7, 8	Article 6(1)B Contractual Obligation
Assessing suitability for a particular job or task	1, 6, 7, 8	Article 6(1)B Contractual Obligation
Dealing with legal disputes involving you, Suppliers, Clients and Sub-Contractors, including accidents at work.	1, 2, 3, 4, 5, 6, 7, 8, 9, 10	Article 6(1)C Legal Obligation

Complying with health and safety obligations.	1, 2, 7, 8, 9, 10	Article 6(1)C Legal Obligation
To prevent fraud.	1, 2, 3, 5	Article 6(1)C Legal Obligation

Failure to provide 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 we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

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 may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policy/other relevant policy.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in line with our data protection policy/other relevant policy.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

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.

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 may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

We envisage that we will hold information about criminal convictions.

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.

We are allowed to use your personal information in this way to carry out our obligations.

DISCLOSURE/DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-parties?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

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.

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

DATA RETENTION

We will store most of your data for a period of at least 6 years following the conclusion of your last contract to meet regulatory best practice. Some financial data will be destroyed after 2 years. Health and Safety information must be held for a minimum of 40 years or longer.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

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. We do ask you to allow us time to make the changes which we will generally be able to complete within 5 working days.

Your rights in connection with personal information

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. Please refer to our DSAR Procedure for more information.
- **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 Ian Clorley in writing.

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 Ian Clorley. 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.

COMPLAINTS

We are not required to appoint a Data Protection Officer 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 Ian Clorley.

Should your complaint show that we have breached our duty of care we will report the breach to the Information Commissioner’s Office (ICO). If you are not satisfied by our response you also 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. The ICO’s contact details are as follows:

Address: Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Email: casework@ico.org.uk



CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will make available 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. **If you have any questions about this privacy notice, please contact Ian Clorley, [ian.clorley@deeley.co.uk / 02476 718718].**

Date: 1st January 2021

Review Date: 31st December 2021