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## **Data Protection Statement**

### **Introduction**

This statement explains the types of personal data Bray's Pipelines may collect about you when you do business with the company. It also explains how your data is stored, handled & kept safe.

The directors know that there's a lot of information here but they want you to be fully informed about your rights, and how Bray's Pipelines uses your data. It is hoped that the following sections will answer any questions you have but if not, please speak to your manager.

This policy statements is reviewed at the end of each year & updates will be issued. Notifications will inform you of any significant changes & you're welcome to check it whenever you wish.

### **Employment with Bray's Pipelines**

When you work with Bray's Pipelines, the company is the data controller.

The regulation on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### **Consent**

In specific situations, the company can collect & process your data, with your consent.

*For example, when you tick a box to receive newsletters by email.*

#### **Contractual obligations**

At work, your personal data is needed to make your contract of employment work – including remuneration.

#### **Legal compliance**

If the law requires the company to, your data may need to be collected and processed – including providing that data to regulatory authorities, such as the HSE.

#### **Legitimate interest**

In specific situations, your data may be needed to pursue legitimate interests in a way which might reasonably be expected as part of running the business and which does not materially impact your rights, freedom or interests.

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## **When is your personal data collected?**

- When you fill in any forms, such as a contract of employment or documentation for training of tender submissions.
- The company also collects information from the Inland Revenue & Customs, to complete a remuneration procedure.
- When you use the car parks, CCTV systems operated for the company's security. These systems may record your image during your visit.

## **What personal data might be collected?**

- The minimum information needed for employment, for example : name, gender, date of birth, home address, email & telephone numbers.
- Collecting copies of documents you provide to prove your age or identity where the law requires this (including your passport and driver's licence). This will include details of your full name, address, date of birth & facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.
- Your image may be recorded on CCTV when you're on company controlled property.
- Your car number plate may be recorded.
- Data relating to health, safety & wellbeing – which may be gathered from you, a GP or a regulatory body.

## **How and why is your personal data used?**

In order to provide remuneration, we use your data when interacting with the Inland Revenue & Customs and the company's accountant.

In order to comply with the Health & Safety at Work Act, the company might need to co-operate with the HSE, Environmental Health & other regulatory authorities.

To gain & maintain work, the company will share limited information to clients about the competent workforce.

If you choose not to share your personal data with us, or refuse certain contact permissions, the company might not be able to provide some employment aspects you expect.

## **How personal data is protected**

The directors know how much data security matters. With this in mind, the company will treat your data with the utmost care and take all appropriate steps to protect it. This is done by :

- Secure access to all areas of data servers
- Access to your personal data is password-protected.

## **How long is your personal data retained ?**

When the company collects or processes your personal data, it will only keep it for as long as is necessary for the purpose for which it was collected. At the end of that retention period, your data will be deleted.

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## **Who is your personal data shared with ?**

The company shares your personal data with trusted third parties, for example : accountant, Inland Revenue & Customs, regulatory authorities & clients having legitimate reasons.

For further information please contact the data protection officer, Neil Bray.

## **What are your rights over your personal data?**

You have the right to request:

- Access to the personal data held about you, free of charge
- The correction of your personal data when incorrect, out of date or incomplete
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact the company request to exercise these rights at any time as follows:

- If the company choose not to action your request, you will be given an explanation for the reasons for the refusal
- Whenever you have given the company your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.
- In cases where the company are processing your personal data on the basis of our legitimate interest, you can ask that it stops for reasons connected to your individual situation. The company must then do so unless it believes there is a legitimate overriding reason to continue processing your personal data.
- If you have authorised a third party to submit a request on your behalf, the company will ask them to prove they have your permission to act.

## **Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with a response to any requests you have made to the company, regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling **0303 123 1113**.

## **Any questions?**

The company hopes this statement has been helpful in setting out the way your personal data is handled, and your rights to control it.

If you have any questions that haven't been covered, please contact the data protection officer who will answer your questions.

## **Who is responsible for this policy?**

The directors have overall responsibility for ensuring that this policy complies with the legal obligations, and that employees and associates comply with it. The policy will be reviewed annually, with intermediate reviews which may become necessary.

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**Who must comply with this policy?**

This policy applies to all persons working for, or on behalf, of the company.



Neil Bray

Managing Director

1<sup>st</sup> January 2021