
PRIVACY NOTICE

BACKGROUND:

CRB Contractors Ltd. understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, contractors, employees and related third parties and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

CRB Contractors Ltd.

Limited Company registered in England under company number 05085360 at 101 Bourne Street, Eastbourne, BN21 3SE

And trading at 38-40 Leslie Street, Eastbourne, BN22 8JB

VAT number: 833 9363 10

Data Protection Officer: Ben Clear

Email address: ben.clear@crbcontractors.co.uk

Telephone number: 01323727200

Postal Address: 38-40 Leslie Street, Eastbourne, BN22 8JB

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way
- i) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us as detailed below:

Domestic Clients

- Name
- Address;
- Email address
- Telephone numbers
- Construction and design details relating to your home, for example; the information shown in the Schedule of Works
- Guarantees for services provided
- Financial information limited to when you paid, how much you paid or how much you owe us. We DO NOT retain bank details or payment information, other than the dates and the amounts paid.

Commercial Client's and other commercial contacts

- Name
- Address
- Email address

- Telephone numbers
- Business name
- Job title

Employees, contractors and sub-contractors

- Name
- Date of birth
- Gender
- Address
- Email address
- Telephone numbers
- Business name
- Job title
- Profession
- Payment information; like bank details and salary information
- Information about your preferences and interests;
- Disciplinary records
- References provided by third parties
- Sickness records
- Medical questionnaire results
- Training records
- Official communications by either party relating to any legal contracts
- Tax details; including information like National Insurance numbers, UTR numbers, Tax Codes and documents like pay slips, P60s, P45s,

Your personal data is obtained from or direct communications or occasionally via a data collector such as Just Simply Organised who manage payments, accounts and payroll.

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your building works
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.

- Supplying you with information by email AND/OR post that you we need to provide you with to fulfil our services. If we ever undertake direct marketing, we would require your consent to use your data for this purpose. If this was the case you would be contacted and permission would be sought.
- For completing our contractual obligations with employees and contractors
- For completing our legal obligations to HMRC and other government bodies
- For managing and monitoring performance of employees and assessing their employment status and any offers of employment

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Consent: Where the legal basis for holding data is consent to hold the data, this will be deleted after 6 years. This includes analytics data collected by Google Analytics via our website.

Contract: We have reason to hold this data for a very long period of time as we have to access guarantee data and the content of the original schedule of works and any communications between clients, contractors and us. We are setting data held on a Contract basis to 20 years, this being the length of some of our guarantees. Clients will be able to request their data is deleted only if they agree to forego the guarantee or if they have a shorter guarantee. Data will not be automatically deleted until 20 years from the end date of the contract unless a valid request is received.

Legal Obligation: This relates to various information like employment details and tax details of employees and contractors. These must be retained during their employment and for six years after their employment to allow to serve our legal obligations regarding potential back dated investigations by HMRC.

8. How and Where Do You Store or Transfer My Personal Data?

We may transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. We currently use Google Cloud based systems provided via their G Suite Services. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Inspect and confirm suitability of third parties who we share your information with like Google (Drive, Gmail)
- Encrypt any sensitive data that we transmit online

- Ensure any third party who we share your data with meets the same standards as set out in this policy by inspecting their policies and procedures, reviewing them annually and making occasional random checks to see they are meeting our standards
- Hold annual reviews of the policy and systems for handling your data to ensure compliance and good management practices
- To any online services which we store your data in; keep our login details secure and change passwords regularly

9. Do You Share My Personal Data?

We will share your personal data with other companies in, employees and contractors for various reasons but always for an essential business function such as; so contractors can make appointments with you to view the work, so our staff can locate and contact you, so that our third party payroll and financial administration team can manage your accounts, payments and in the case of sub-contractors and employees, specifically tax requirements. This includes Just Simply Organised, Hodore Farm House, Parrock Ln, Upper Hartfield, Hartfield TN7 4AR for payments, financial information, accounts and salaries, payroll tax computations and allied tasks.

If any of your personal data is required by a third party, as described above, we] will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data **we** have about you, you can ask **us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection,

including to make a subject access request, please use the following details [(for the attention of Ben Clear

Email address: ben.clear@crbcontractors.co.uk

Telephone number: 01323727200

Postal Address: 38-40 Leslie Street, Eastbourne, BN21 3SE

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via an updated Privacy Policy.