Data Protection Policy

At Build 4 Growth Limited we are committed to protecting the confidential and personal details of our colleagues and customers. We gather and use certain information about individuals, these can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with, or may need to contact.

This policy describes how this personal data must be collected, handled and stored in order to meet the company's data protection standards – and to comply with the law.

This Data Protection Policy ensures that Build 4 Growth Ltd:

- Only collect personal data that is relevant and is used solely for the purpose in which it was collected
- Complies with data protection law and follows good practice
- Protects the rights of its staff and customers
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

The EU General Data Protection Regulation (GDPR) describes how organisations, including Build 4 Growth Ltd. must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the regulation, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The EU General Data Protection Regulation (GDPR) is underpinned by six important principles, these say that personal data must:

1. Be processed lawfully, fairly and in a transparent manner
2. Be obtained only for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
3. Be adequate, relevant and limited to what is necessary
4. Be accurate and where necessary, kept up to date
5. Not be held longer than is necessary for the purpose
6. Appropriate technical and organisational measures are in place to prevent unauthorised or unlawful processing, loss, damage or destruction

This policy applies to:

- The head office of Build 4 Growth Ltd.
- All working construction sites of Build 4 Growth Ltd.

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- All staff of Build 4 Growth Ltd.
- All contractors, suppliers and other people working on behalf of Build 4 Growth Ltd.

It applies to all data that the company holds relating to identifiable individuals, even if the information technically falls outside of the EU General Data Protection Regulation (GDPR).

This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Any other information relating to individuals

Data Protection risks

This policy helps to protect Build 4 Growth Ltd. from data security risks, including:

- **Breaches of confidentiality**. For instance being given out inappropriately
- **Failing to offer choice**. For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage**. For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for/with Build 4 Growth Ltd. has some responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data, must ensure that it is handled and processed in line with this policy and data protection principles. However, these people have key areas of responsibility:

- The Managing Director is ultimately responsible for ensuring that Build 4 Growth Ltd. meets its legal obligations.
- The Managing Director is also responsible for:
  - Keeping updated about data protection responsibilities
  - Reviewing data protection procedures and related policies, in line with an agreed schedule
  - Arranging data protection training and advice for the people covered by this policy
  - Handling data protection questions from anyone covered by this policy
  - Secure and confidential disposal of data that is no longer required
- Cutler IT (IT Support Services) is responsible for:
  - Ensuring all systems, services and equipment used for storing data meet acceptable security standards

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- Performing regular checks and scans to ensure security hardware and software is functioning properly
- Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services

General staff guidelines

- The only people able to access data covered by this policy should be those who need it for their work
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers
- Build 4 Growth Ltd. will provide training to all employees to help them understand their responsibilities, when handling data
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below
- Strong electronic passwords must be used and they should never be shared, these should be changed on a regular basis
- Personal data should not be disclosed to unauthorised people, either within the company or externally
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, then it should be deleted and disposed of
- Employees should request help from their line manager if they are unsure about any aspect in regard to data protection
- Any potential breaches of data protection should be reported to the Business Development Administrator, who will raise a Non-Conformance Report logging the issue. The potential breach will then be investigated, and any preventive actions implemented. If found to be a genuine data protection breach, it will be reported to the relevant governing bodies.

Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to Cutler IT.

When data is stored on paper, it should be kept in a secure place, where unauthorised people cannot access it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper/files should be kept in a locked drawer or filing cabinet

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- Employees should make sure paper and print outs are not left where unauthorised people could see them, like on a printer
- Data print outs should be shredded and disposed of securely, when no longer required

When data is stored electronically, it must be protected from unauthorised access, accidental deletion, and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared between employees
- If data is stored on removable media (like a USB), they should be kept locked away securely, when not being used
- Data should be stored on designated drives and servers, and should only be uploaded to an approved cloud computing service
- Servers containing personal data are sited in a secure location, away from the general office space
- Data should be backed up frequently. These backups should be tested regularly, in line with the company's standard backup procedures
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones
- All servers and computers containing data should be protected by approved security software and a firewall

Data use

Personal data is of no value to Build 4 Growth Ltd. unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption, or theft:

- When working with personal data, employees should ensure the screens of their computers are always locked when left unattended
- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure
- Data must be encrypted before being transferred electronically. Cutler IT can explain how to send data to authorised external contacts
- Personal data should never be transferred outside of the European Economic Area
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data

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Data Accuracy

The law requires Build 4 Growth Ltd. to take reasonable steps to ensure that data is kept accurate and up to date. The more important it is that the personal data is accurate, the greater the effort Build 4 Growth Ltd. put into ensuring its accuracy. It is the responsibility of all employees who work with data to take reasonable steps to ensure that it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary, staff should not create any unnecessary additional data sets
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database

Subject Access Requests

All individuals who are the subject of personal data held by Build 4 Growth Ltd are entitled to:

- Ask what information the company holds about them, why, and how it is being used
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the company is meeting its data protection obligations
- Know how to exercise their rights

If an individual contacts the company requesting this information, this is called a subject access request. Subject access requests from individuals should be made by email. Build 4 Growth Ltd. will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing data for other reasons

In certain circumstances, the EU General Data Protection Regulation (GDPR) allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, Build 4 Growth Ltd. will disclose requested data. However, we will ensure that the request is legitimate, seeking guidance from the company's legal advisers, where necessary.

Signed- S Alderson Date 26/06/2024

Seth Alderson
Managing Director

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