



STAFF PRIVACY NOTICE – GDPR POLICY STATEMENT

AWD Scaffolding Ltd is committed to protecting the privacy and security of your personal data. This privacy notice details how we collect and use personal information about current and former employees, workers and contractors during and after the working relationship, in accordance with the General Data Protection Regulation 2018 ("GDPR").

Within the Company is a "data controller" and they are responsible for deciding how we hold and use personal information about you and for communicating that with you.

The Company may issue other privacy notices on specific occasions, and you should read this and any other privacy notices so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way;
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
3. Relevant to the purposes we have told you about and limited only to those purposes;
4. Accurate and kept up to date;
5. Kept only as long as necessary for the purposes we have told you about; and
6. Kept securely.

Personal data we hold about you

Under the GDPR "personal data" means any information about you from which you can be identified. It does not include anonymous data. There are also "special categories" of more sensitive personal data which require a higher level of protection.

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

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth;
- Gender;
- Marital status and dependants
- Next of kin and emergency contact information;
- National Insurance number;
- Bank account details, payroll records and tax status information;
- Salary, annual leave, pension and benefits information;
- Start date;
- Location of employment or workplace;
- Copy of driving licence;
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);

- Employment records (including job titles, work history, working hours, training records and professional memberships);
- Compensation history;
- Performance information;
- Disciplinary and grievance information;
- CCTV footage and other information obtained through electronic means such as swipecard records; and
- Information about your use of our information and communications systems.

We may also collect, store and use information about your health, including any medical condition, health and sickness records which is regarded as a "special category" of more sensitive personal information.

How do we collect your personal data?

We collect personal information about employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency. We may sometimes collect additional information from third parties including former employers and professional certification agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

How we use your personal data

We will only use your personal information when the law allows us to, most commonly in the following circumstances:

1. Where we need to perform the employment contract with you;
2. Where we need to comply with a legal obligation; and
3. 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:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

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 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.

- Making a decision about your recruitment or appointment;
- Deciding the terms on which you work for the Company;
- Checking you are legally entitled to work in the UK;
- Paying you and, if you are an employee, deducting tax and National Insurance contributions;

- Providing you with employment benefits;
- Dealing with pension payments and administration;
- Administering our employment contract or contractor arrangement with you;
- Business management and planning, including accounting and auditing;
- Conducting performance reviews, managing performance and deciding performance requirements;
- Making decisions about salary reviews and compensation;
- Assessing qualifications and/or certifications for a job or task, including decisions about promotions;
- Gathering evidence for possible grievance or disciplinary hearings;
- Making decisions about your continued employment or engagement;
- Making arrangements for the termination of our working relationship;
- Education, training and development requirements;
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- Ascertaining your fitness to work;
- Managing sickness absence;
- Complying with health and safety obligations;
- To prevent fraud;
- To monitor your use of our information and communication systems to ensure compliance with our IT policies; and
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

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

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).

Change of purpose

We will only use your personal data for the purposes which we collected it for, unless we reasonably 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.

Special categories of sensitive personal data

"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 data.

How we use particularly sensitive personal data

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 relevant internal policies;
or
3. 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.

Our obligations as an employer

We may use your particularly sensitive personal information in the following ways:

- Relating to leaves of absence to comply with legal obligations;
- 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.

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.

Information about criminal convictions

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

Information about automated decision making

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.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the company. We require any such third parties to respect the confidentiality and security of your data and to treat it in accordance with our instructions and the law.

Why might you share my personal information with third parties?

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 process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within the company. The following activities may be carried out by third-party service providers: payroll, pension administration, benefits provision and administration, insurance, IT services, training and certification.

We may also share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business or to our professional advisers for the purposes of taking legal, tax or other advice, obtaining insurance, dealing with industry organisations or certification bodies. We may also need to share your personal information with a regulator or to otherwise comply with the law.

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.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary for the purposes we collected it for and as legally required. When deciding the appropriate retention periods 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.

If appropriate, 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.

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.

Your rights regarding 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.
- **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 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 your line manager.

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.

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.

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 your line manager. 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.

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.

If you have any questions about this privacy notice, please contact your line Manager or Director.

Signed: 

Anthony Davies

Director responsible Privacy and GDPR

Dated: 06 January 2026