

1 Contractors Data

As a Sub Contractor for JLX, you supply us with various personal data which allows us to work together on multiple contracts.

To remain compliant across various sectors of the construction industry it is necessary to share your data with various organisations and auditing platforms.

This allows us to hold multiple recognised accreditations and offer training across multiple platforms

1.1 Data Held

<p><u>DATA WE MAY HOLD</u></p> <ul style="list-style-type: none"> • Full Name (Including previous / maiden names) • Address (including previous addresses) • Telephone Numbers • Emails Addresses (personal/company) • Passport • Driving Licence • NI Number • Date of Birth • Next of Kin information • Bank – Sort/Account Number • UTR Number • Company Number • Criminal Record Checks • Mortgages • <u>Any Other Relevant Information Requested by us and supplied by yourselves</u> 	<p><u>WHO WE SHARE WITH</u></p> <ul style="list-style-type: none"> • DDC (or equivalent Discloser Service) • TFL / Sentinel / King Fisher Access / Hurruk (or any other training supplier relevant to the contract you are working on) • Express Medicals • HMRC • The Primary Contractors (of a contract you are working on or are being considered to work on) • <u>Any other Relevant Company or organisation that is vital to the running of JLX Consultants</u>
<p><u>SENSITIVE / SPECIAL DATA</u></p> <ul style="list-style-type: none"> • Race (only gained from passport) • Ethnic Origin (only gained from passport and sentinel questionnaire) • Health (only gained from self and professional medicals) 	
<p><u>Criminal Record Checks</u></p> <p><u>DBS checks will only be carried out when a contractor's role requires one.</u></p> <p>You will always be informed and asked to input your own data by a recognised DBS service such as DDC</p>	<p>Written Consent will be asked for before sharing any Criminal Record Information with any third party</p>

1.2 Marketing and sharing data for profit

Under no circumstances will JLX Consultants ever divulge personal data for marketing purposes nor will we ever sell your data to any other company or individual

1.3 Contractors Rights

‘Right to be informed’

All contractors will be issued a copy of the data policy and be kept up to date with any changes to the policy

‘Right of Access’

All contractors will have the right to access and view any and all data held on them, by arranging an appointment with JLX Consultants head office.

‘Right to rectification of Data’

All contractors will have the right to rectify any data held retaining to themselves, JLX may ask for proof of the rectified data before processing

‘Right to be forgotten’

under certain circumstances and on request JLX will delete all data held about yourselves that we are legally allowed to remove from our systems

‘Right to Block or Suppress processing of personal data’

All Contractors have the right to object to the processing of their personal data. This effectively allows individuals to ask you to stop processing their personal data. The right to object only applies in certain circumstances

‘Right to Data Portability’

The right to data portability gives individuals the right to receive personal data they have provided to a controller in a structured, commonly used and machine-readable format. It also gives them the right to request that a controller transmits this data directly to another controller.

1.4 Schedule Personnel Records

The period of which personnel records will be kept will fall in line with JLXs policy’s as set out below

Description	Retention Period	Disposal Route
Induction Documents	Term of Contract	Delete / Shred
Personnel Files	Term of Contract	Delete / Shred
Competency and Training Records	Term of Contract	Delete / Shred
PPE Records	Term of Contract	Delete / Shred
Medical Records	Term of Contract	Delete / Shred
D&A Screening Records	10yrs Negative / Indefinitely Positive	Delete / Shred
Payroll activities,	Min 7 Years	Delete / Shred

2 Customer Data

2.1 Data Held

<p><u>DATA WE MAY HOLD</u></p> <ul style="list-style-type: none"> • Full Name • Address • Telephone Numbers • Emails Addresses • <u>Any Other Relevant Information Requested by us and supplied by yourselves</u> 	<p><u>WHO WE SHARE WITH</u></p> <ul style="list-style-type: none"> • Suppliers of materials for the job contracted for • Employees and sub-contractors of JLX Consultants • <u>Any other Relevant Company, organisation or individual that is vital to the completion of the job</u>
<p><u>SENSITIVE / SPECIAL DATA</u></p> <ul style="list-style-type: none"> • NONE 	
<p><u>Criminal Record Checks</u></p> <ul style="list-style-type: none"> • NONE 	

2.2 Marketing and sharing data for profit

Under no circumstances will JLX Consultants ever divulge your personal data for marketing purposes nor will we ever sell your data to any other company or individual

2.3 Customers Rights

‘Right to be informed’

All customer may have a copy of JLX Consultants Data Policy on request.

‘Right of Access’

All customers will have the right to access and view any and all data held on them, by written request

‘Right to rectification of Data’

All contractors will have the right to rectify any Data held retaining to themselves.

‘Right to be forgotten’

under certain circumstances and on request JLX will delete all data held about yourselves that we are legally allowed to remove from our systems

‘Right to Block or Suppress processing of personal data’

All Customers have the right to object to the processing of their personal data. This effectively allows individuals to ask you to stop processing their personal data. The right to object only applies in certain circumstances

‘Right to Data Portability’

The right to data portability gives individuals the right to receive personal data they have provided to a controller in a structured, commonly used and machine-readable format. It also gives them the right to request that a controller transmits this data directly to another controller.

2.4 Schedule Personnel Records

The period of which personnel records will be kept will fall in line with JLXs policy’s as set out below

<u>Description</u>	<u>Retention Period</u>	<u>Disposal Route</u>
Purchase Orders	Min 3 Years	Delete / Shred
Invoices	Min 7 Years	Delete / Shred
Delivery Notes	Min 3 Years	Delete / Shred
Project Files	Min 3 Years	Delete / Shred

3 Protection

3.1 Data protection

To ensure the data protection of JLX consultants the following safeguards will be put into place

- JLX Consultants will appoint one data controller who will oversee the safeguards and distribution of all JLX data storage systems
- The controller will appoint a deputy controller who will have the same level of access as the controller
- Processors will be appointed by the controller.
- Controllers and Processors will have access to personal data only on JLX owned and encrypted machines
- A full list of owned and encrypted machines will be maintained as well as password lists
- Passwords will be changed yearly
- Controllers and processors will have individual accounts linked to a company's email address, unlike the shares accounts of engineers

3.2 Prohibitions

The following is prohibited to all controllers and processors with out written consent from the controller. deputy controller to authorise controller.

Any evidence of any wilful disregard to the prohibitions below will result in instant dismissal and legal action taken.

- Add any data containing JLX system onto any device not approved and added to the data machine list.
- Make any copy's or back ups of data containing systems.
- Distribute any data to any persons or companies that will not legitimately advance the interests of the subject of the data.

3.3 Data breaches: positive action needed for all but most trivial breaches

JLX Consultants will report to the relevant regulator of a personal data breach within 72 hours of becoming aware of the breach unless they are able to demonstrate that the breach is unlikely to result in risk to the individual's rights and freedoms.

All breaches will be logged in a data breach preventative and correction tracker and the outcome logged.

John Ellis
Managing Director

