

## Data Protection Policy

### Introduction

CB Services Group ('The Company') provides construction services to various trades and industries. In the course of its operations, the Company processes personal data of clients, employees, suppliers, and other stakeholders.

This policy sets out the Company's commitment to ensuring that any personal data, including special category personal data, is processed in accordance with UK data protection laws, including the GDPR and the UK Data Protection Act 2018.

The Company is committed to embedding good data protection practices throughout the organisation and promoting a culture of compliance.

This policy adheres to the following:

- General Data Protection Regulation (GDPR) 2016/679
- UK Data Protection Act 2018
- Other relevant UK and EU data protection legislation

### Scope

This policy applies to all personal data processed by the Company, whether it relates to clients, employees, suppliers, or other third parties. All Company staff are expected to comply with this policy, and failure to do so may result in disciplinary action, including dismissal.

### Data Protection Principles

- The Company complies with the following data protection principles when processing personal data:
- Lawfulness, Fairness, and Transparency: Personal data is processed lawfully, fairly, and in a transparent manner.
- Purpose Limitation: Data is collected for specified, legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Data Minimisation: Personal data collected is adequate, relevant, and limited to what is necessary for the intended purposes.
- Accuracy: Personal data is accurate and kept up to date. Inaccurate data will be corrected or erased promptly.
- Storage Limitation: Data is stored in a form that permits identification of data subjects for no longer than necessary for the purposes for which the data is processed.



 4 Langford Court, LangfordBridge Farm,  
Ongar Road, Brentwood, Essex, CM15 0LB

 01277 361 460

 [enquiries@cbservicesgroup.co.uk](mailto:enquiries@cbservicesgroup.co.uk)

- Integrity and Confidentiality: Personal data is processed in a manner that ensures its security, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage through appropriate technical and organisational measures.

## Lawful Bases for Processing

The Company processes personal data based on one or more of the following lawful grounds, as required under GDPR Article 6:

- Consent: Where explicit consent has been provided by the individual.
- Contractual Necessity: Where processing is necessary to perform a contract with the individual or to take steps at the individual's request before entering into a contract.
- Legal Obligation: Where processing is necessary to comply with a legal obligation.
- Legitimate Interests: Where processing is necessary for the legitimate interests of the business, provided that these interests do not override the rights and freedoms of the individual.
- Vital Interests: Where processing is necessary to protect someone's life.

## Data Subject Rights and Procedures

The Company is committed to facilitating the rights of data subjects as outlined under GDPR. These rights include:

- Subject Access: Individuals have the right to access their personal data and request details about how it is processed.
- Rectification: Individuals can request correction of inaccurate or incomplete data.
- Erasure (Right to be Forgotten): Individuals can request the deletion of their data in certain circumstances, such as when the data is no longer necessary for the purposes it was collected.
- Restriction of Processing: Individuals can request a restriction on the processing of their data under certain conditions.
- Data Portability: Where applicable, individuals have the right to receive their data in a structured, commonly used format and transmit it to another data controller.
- Objection to Processing: Individuals can object to the processing of their data based on legitimate interests unless the Company can demonstrate compelling legitimate grounds that override the individual's interests.
- Only hold onto your personal data for as long as it is needed, after which time the Company will securely erase or delete the personal data – CB Services Group's Retention Record Guidance - IMS015 sets out the appropriate period of time

Breaching this policy may result in disciplinary action for misconduct, including dismissal. Obtaining (including accessing) or disclosing personal data in breach of the Company's data protection policies may also be a criminal offence.

## Handling of Subject Access Requests (SARs)

Requests for exercising these rights will be addressed within one month of receipt. If an extension is required, the data subject will be notified within the initial one-month period with reasons for the delay.

## Privacy Impact Assessments (PIAs)

The Company will conduct Privacy Impact Assessments (PIAs) when introducing new processes, systems, or projects that involve the processing of personal data, particularly when the processing could result in a high risk to individuals' rights and freedoms. PIAs help identify and mitigate privacy risks early in the planning stages of such activities.

## Data Breach Response and Reporting

In the event of a personal data breach, the Company will:

- Notify the Information Commissioner's Office (ICO) within 72 hours if the breach poses a risk to individuals' rights and freedoms
- Inform affected individuals without undue delay if the breach is likely to result in a high risk to their rights and freedoms
- Document all data breaches, regardless of the impact, to ensure proper analysis and future prevention measures

## Data Retention and Disposal

The Company retains personal data only for as long as necessary for the purposes for which it was collected. Once the data is no longer needed, it will be securely erased in accordance with the Company's Retention Record Guidance - IMS015.

## Employee Training and Awareness

All employees who handle personal data on behalf of the Company are required to undergo data protection training. This training is conducted at least annually and whenever there are significant changes in data protection laws or internal processes.

## Third-Party Data Sharing and Processors

The Company may share personal data with third-party processors as necessary to fulfil business operations. All third parties engaged by the Company are required to sign data processing agreements that ensure their compliance with GDPR and other relevant data protection legislation.

The Company ensures that third-party processors implement appropriate technical and organisational measures to protect the personal data they process on behalf of the company.

## Responsibility for this policy

The Directors take ultimate responsibility for data protection. If you have any concerns or wish to exercise any of your rights under the GDPR, then you can contact the data protection lead in the following ways: -

**Name:** Chris Bland

**Address:** 4, Langford Court, Langford Bridge Farm, Ongar Rd, Kelvedon Hatch, Brentwood CM15 0LB

**Email:** [chris.bland@cbservicesgroup.co.uk](mailto:chris.bland@cbservicesgroup.co.uk)

**Telephone:** 01277 361460

## Monitoring and review

This policy shall be regularly monitored and reviewed, at least every year.

Signed:

A handwritten signature in black ink, appearing to read 'Charlie Brown', is written over a light blue horizontal line.

Charlie Brown  
Managing Director

**Date issued:** 17<sup>th</sup> October 2024 | **Review Date:** 17<sup>th</sup> October 2025