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**1. INTRODUCTION**

The UK General Data Protection Regulations (UK GDPR) and EU General Data Protection Regulations (EU GDPR) referred to here after as GDPR both require organisations to be more transparent and accountable in how the personal data they hold is processed.

Geda Construction takes privacy seriously and this privacy policy explains why and how your personal data is used if you are a candidate, client, sub-contractor, supplier or web user. *Note: This website is not intended for children and we do not knowingly collect data relating to children.*

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Procedures are in place to deal with any suspected personal data breach and we will notify you and any applicable regulator of a breach where we are legally required to do so.

**2. COMPANY CONTACT INFORMATION**

Name: Geda Construction

Head Office Address: 36 Moor Road, Coalisland, Dungannon, Co. Tyrone, N. Ireland.

Phone Number: 028 8774 7600 or 01509 670 878

E-mail: [info@geda.co.uk](mailto:info@geda.co.uk) or [hr&training@geda.co.uk](mailto:hr&training@geda.co.uk)

**3. THE TYPE OF PERSONAL INFORMATION WE COLLECT**

Personal data means any information that relates to an 'identified' or 'identifiable' living person that is processed.

The Company is a data controller in respect of the personal information that it processes in connection with the business and are committed to safeguarding your personal data through the systems, processes and training implemented.

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We may collect, use, store and transfer the following personal data which we have grouped together as follows:

- **Personal Identity Data** – includes: name, candidate reference number, or similar identifier, title, date of birth and gender.
- **Contact Data** – includes: personal or business address, delivery address, email address, social media account identifiers and telephone numbers.
- **Qualifications, Experience and Training Data** – includes: previous employment, qualifications e.g., CSR, CSCS, SMSTS, SSSTS and Safe pass.
- **Special Category Data** – includes: community background (the condition for processing this special category data is Article 9(2)(g) 'Reasons of substantial public interest'), medical information and biometric data - where used for identification purposes (the condition for processing these special category data is Article 9(2)(b) Employment, social security and social protection law. This data will be retained and erased in accordance with policy.
- **Financial Data** – includes: bank account and payment card details.
- **Transaction Data** – includes: details about payments to and from you and other details of services provided by us.
- **Technical Data** – includes: internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** – includes: information about how you use our website, products and services. We may process data about your use of our website and services. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics.
- **Marketing Data** – includes: your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Communication Data** – includes: information contained in or relating to any communication that you send to us or that we send to you. The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.

#### 4. CANDIDATE

Most of the personal information we process is provided to us directly by you or indirectly through a recruitment agency acting on your behalf. Under GDPR the type of data, the lawful basis for processing data and how we use the data are detailed below:

**Table 1: Candidate Data**

TYPE OF DATA	LAWFUL BASES FOR PROCESSING	HOW IT IS USED
<b>CVs</b> We may process: Personal Identity Data, Contact Data, Qualifications, Experience & Training Data.	Necessary for Contract	For the provision of short-listing against job role criteria and communicate with candidates regarding their application e.g., regrets, invite to interview or offer of employment.
<b>Monitoring Forms</b> We may process: Special Category Data.	Legal Obligation	Reasonable considerations or adjustments for interview. Equality Commission annual monitoring return.
<b>Interview Notes</b> We may process: Personal Identity Data, Contact Data, Qualifications, Experience & Training Data.	Legitimate Interest Necessary for Contract	All interview notes are kept to supply feedback to applicants and demonstrating fairness. For the successful applicant this is an extension of their contract of employment.

We may share this information with the Equality Commission of Northern Ireland.

**How we store your personal information**

Your information is securely stored in soft copy format only on a drive with restricted access to the HRD team.

We keep candidate data for 4 years. We will then dispose of your information by deleting the soft copy job folder.

**5. CLIENT**

Most of the personal information we process is provided to us directly by you. Under GDPR the type of data, the lawful basis for processing data and how we use the data are detailed below:

**Table 2: Client Data**

TYPE OF DATA	LAWFUL BASES FOR PROCESSING THIS DATA:	HOW WE USE THE PERSONAL INFORMATION
<b>Communications</b> We may process: Personal Identity Data, Contact Data & Communication Data.	Necessary for Contract Legitimate Interests	If you communicate with us these will be referred for the necessary contractual reference.

<b>Supply Chain Newsletter</b> We may process: Personal Identity Data & Contact Data.	Consent	Send updates once a quarter on what the Company is doing.
<b>Client Contracts   Tender &amp; PQQ</b> We may process: Personal Identity Data, Contact Data & Communication Data.	Necessary for Contract Legitimate Interests Consent	Information provided will be referred to or referenced to ensure that the contract is being adhered to. In the event that pre construction drawing information for the completion of the contract. References or quotes may be used for future tender submissions.
<b>QR Code Weekly COVID 19 health declaration</b> We may process: Personal Identity Data, Contact Data & Special Category Data	Legitimate Interest Legal Compliance	H&S reminder to all site personnel.
<b>QR Code Sign in   out</b> We may process: Personal Identity Data, & Contact Data.	Legitimate Interest Compliance with Legal Obligation	If you visit a site   office your data will be logged to comply with Health and Safety at Work Act 1974 (c. 37), Health & Safety at Work Order and Health and Welfare at Work Act.
<b>H&amp;S Records - Incident Reports</b> We may process: Personal Identity Data, Contact Data & Special Category Data.	Compliance with Legal Obligation	In the event of an incident or accident your data will be held including any medical information recorded to comply with the Health & Safety at Work Act 1974 (c. 37) and Health & Safety at Work Order.
<b>Evaluations of Work</b> We may process: Personal Identity Data, & Contact Data.	Necessary for Contract	Forward for approval of works.
<b>Tenant or Resident</b> We may process: Personal Identity Data, Contact Data & Communication Data.	Necessary for Contract	In the event of contact required for snagging or continuous improvement.

We may be required to share this information for legislative reasons with HSE | HSA and contractually with our insurance company.

### How we store your personal information

Your information is securely stored in soft copy format only on a drive with restricted access to approved employees only.

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As a client we keep your data for 10 years, any personal data relating to Covid-19 will only be held for 21 days. We will dispose of your information by deleting the soft copy site folder and shredding hard copy folders.

## 6. SUB-CONTRACTOR

Most of the personal information we process is provided to us directly by you or indirectly by your employer or an agent acting on your behalf. Under GDPR the type of data, the lawful basis for processing data and how we use the data are detailed below:

**Table 3: Sub-Contractor**

TYPE OF DATA	LAWFUL BASES FOR PROCESSING THIS DATA:	HOW WE USE THE PERSONAL INFORMATION
<b>PQQ &amp; Tender</b> We may process: Personal Identity Data, Qualification, Experience & Training Data.	Necessary for Contract	CV's may be used for the performance of a contract with the data subject or to take steps to enter into a contract.
<b>Quotations</b> We may process: Personal Identity Data, & Contact Data.	Necessary for Contract	Used for the performance of a contract with the data subject or third party or to take steps to enter into a contract.
<b>Site Training Certificates and Cards</b> We may process: Personal Identity Data, Qualifications, Experience and Training Data & Special Category Data – Biometric e.g., photographic H&S cards.	Legitimate Interest Legal Compliance	To ensure competency in role and health and safety compliance for site.
<b>Site Induction</b> We may process: Personal Identity Data, Contact Data & Special Category Data - Medical	Legitimate Interest Legal Compliance	Compliance with H&S requirements, contact details for emergencies and medical information from a H&S requirement, disability i.e., reasonable adjustments and legal COVID19.
<b>QR Code Daily sign in   out</b> We may process: Personal Identity Data	Necessary for Contract Legitimate interest	Recording of on and off-site information.
<b>QR Code Covid 19 Onboarding and Weekly COVID 19 health declaration</b> We may process:	Legitimate Interest Legal Compliance	H&S reminder to all site personnel.

Personal Identity Data, Contact Data & Special Category Data		
<b>Daily Allocation Sheet</b> We may process: Personal Identity Data	Legitimate Interest	Work scheduling recording who, what, where when and why site personnel are on site.
<b>*Evaluations of Work</b> (Personal Identity Data, & Contact Data.)	Necessary for Contract	Forward for approval of works.
<b>*Invoices</b> We may process: Contact Data & Financial Data	Necessary for Contract	Payment for Sub Contractor Services
<b>Drug &amp; Alcohol Testing</b> We may process: Personal Identity Data, Contact Data & Special Category Data - Medical	Legitimate Interest Legal Compliance Necessary for Contract	Demonstrate compliance with H&S or client contract requirement 'For Cause', 'Random' or Contract Requirement Testing.
<b>H&amp;S Records - Incident Reports</b> We may process: Personal Identity Data, Contact Data & Special Category Data - Health	Legal Obligation	Health and Safety at Work etc Act 1974 (c. 37) Health & Safety at Work Order Safety, Health & Welfare at Work (Reporting of Accidents & Dangerous Occurrences) Regulation
<b>HAS   HSE Reports</b> We may process: Personal Identity Data	Legitimate Interest	Ensure H&S policies are being followed.
<b>Compliments   Complaints Records</b> We may process: Personal Identity Data, Contact Data & Communication Data	Legitimate Interest	Fault resolution, client satisfaction.
<b>Contract Files</b> We may process: Personal Identity Data & Special Category Data - Medical	Legitimate Interest	Contract files will contain how H&S policies have been followed and may include any accident or incident books   forms.
<b>QR Code Tool Box Talks</b> We may process: Personal Identity Data	Legitimate Interest Legal Compliance	Log of Tool Box Talk completed on site for H&S compliance.
<b>Insurance Claims</b> We may process: Personal Identity Data	Legal Obligation	In the event that we are required to provide information to Insurance Company.

<b>Communications</b> We may process: Personal Identity Data, Contact Data & Communication Data	Legitimate Interests	Employee and sub-contractor communications.
<b>Supply Chain Newsletter</b> We may process: Personal Identity Data & Contact Data	Consent	Send updates once a quarter on what the Company is doing.

\*this will only be deemed personal data where it relates to a sole trader.

We may be required to share this information for legislative reasons with HSE | HSA and contractually with our insurance company.

### How we store your personal information

Your information is securely stored in soft copy format only on a drive with restricted access to approved employees only.

As a sub-contractor we keep your data for 10 years, any personal data relating to Covid-19 will only be held for 21 days. We will dispose of your information by deleting the soft copy site folder and shredding hard copy folders.

### 7. SUPPLIER

Most of the personal information we process is provided to us directly by you or indirectly by your employer. Under GDPR the type of data, the lawful basis for processing data and how we use the data are detailed below:

**Table 4: Supplier**

TYPE OF DATA	LAWFUL BASES FOR PROCESSING THIS DATA:	HOW WE USE THE PERSONAL INFORMATION
<b>PQQ &amp; Tender Responses</b> We may process: Personal Identity Data, Qualification, Experience & Training Data	Necessary for Contract	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
<b>Quotations</b> We may process: Personal Identity Data, & Contact Data	Necessary for Contract	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
<b>Invoices</b> We may process: Contact Data & Financial Data	Necessary for Contract	Payment for Supplier Services.
<b>H&amp;S Records - Incident Reports</b> We may process: Personal Identity Data, Contact Data & Special Category Data - Medical	Legal Obligation	Health and Safety at Work etc Act 1974 (c. 37). Health & Safety at Work Order Safety, Health & Welfare at Work (Reporting Of Accidents & Dangerous Occurrences) Regulation
<b>HAS HSE Reports</b> (Personal Identity Data)	Legitimate Interests	For the purpose of ensuring H&S policies are being followed.
<b>Contract Files</b> We may process: Personal Identity Data & Special Category Data - Medical	Legitimate Interests	For the purpose of ensuring H&S policies are being followed.
<b>Insurance Claims</b> We may process: Personal Identity Data	Legal Obligation	For the purpose of in the event that we are required to provide information to Insurance Company.
<b>Communications</b> We may process: Personal Identity Data, Contact Data & Communication Data	Legitimate Interests	Employee and supplier communications to confirm agreements and price quotes.
<b>Supply Chain Newsletter</b> We may process: Personal Identity Data & Contact Data	Consent	For the purpose of sending Company updates once a quarter.



We may be required to share this information for legislative reasons with HSE | HSA and contractually with our insurance company.

### How we store your personal information

Your information is securely stored in soft copy format only on a drive with restricted access to approved employees only.

As a supplier we keep your data for 10 years, any personal data relating to Covid-19 will only be held for 21 days. We will dispose of your information by deleting the soft copy site folder and shredding hard copy folders.

## 8. WEB USER

Most of the personal information we process is provided to us directly by you. Under GDPR the type of data, the lawful basis for processing data and how we use the data are detailed below:

**Table 4: Web User**

TYPE OF DATA	LAWFUL BASES FOR PROCESSING THIS DATA:	HOW WE USE THE PERSONAL INFORMATION
<b>Operations of our Website</b> We may process:	Legitimate Interest	For the purpose of the proper administration of our website.
<b>Managing our Relationships and Communications</b> with you. We may process: Contact Data and   or Communication Data [excluding communicating for the purposes of direct marketing]	Legitimate Interest	For the of providing support services and complaint handling, namely communications with our website visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our website, services and business.
<b>Direct Marketing</b> We may process: Contact Data	Legitimate Interest	For the purpose of namely promoting our business and communicating marketing messages and offers to our website visitors and service users.
<b>Research and Analysis</b> We may process: Usage Data	Legitimate Interest	For the purpose of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business, namely monitoring, supporting, improving and securing our website, services and business generally.
<b>Record Keeping</b>	Legitimate Interest	For the purposes of creating and maintaining our databases, back-up copies of our

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We may process: Usage Data & Communication Data		databases and our business records generally, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
<b>Security</b> We may process: Usage Data	Legitimate Interest	For the purposes of security and the prevention of fraud and other criminal activity, namely the protection of our website, services and business, and the protection of others.
<b>Insurance and Risk Management</b> We may process: Personal Identity Data	Legitimate Interest	For the purposes of obtaining or maintaining insurance coverage, managing risks and   or obtaining professional advice, namely the proper protection of our business against risks.
<b>Legal Claims</b> We may process: Personal Data	Legitimate Interest	For the purpose for where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
<b>Legal compliance and vital interests</b> We may process: Personal Data	Legal Obligation Vital Interest	For the purpose for which we are subject or in order to protect your vital interests or the vital interests of another natural person.

### How we store your personal information

Your information is securely stored in soft copy format only on a drive with restricted access to approved employees only.

As a web user we keep your data for 10 years and we will dispose of your information by deleting the soft copy site folder and shredding hard copy folders.

### 9. YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us by emailing [dataprotectionmanager@geda.co.uk](mailto:dataprotectionmanager@geda.co.uk), by telephone 028 8774 7600 and | or 36 Moor Road, Dungannon, Co. Tyrone, BT71 4QB if you wish to make a request.

**We may transfer your personal data outside of the UK to ROI (EU) or if you are a resident in the ROI, we may transfer your personal information to the UK. If we do, you can expect the same degree of protection in respect of your personal information.**

## 10. HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at [dataprotectionmanager@geda.co.uk](mailto:dataprotectionmanager@geda.co.uk), by telephone 028 8774 7600 and | or 36 Moor Road, Dungannon, Co. Tyrone, BT71 4QB.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

A handwritten signature in black ink, appearing to read 'Aaron Hughes'.

Aaron Hughes  
**Managing Director**  
June 2021