



Oliveti Construction Limited **Privacy Policy**

1. Introduction

In its everyday business operations Oliveti Construction Limited makes use of a variety of data about identifiable individuals which can include data about:

- Current, past and prospective employees
- Suppliers/Subcontractors
- Customers/Clients
- Users of our company website
- Other stakeholders

In collecting and using this data the organisation is subject to a variety of legislation controlling how such activities must be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to set out the relevant legislation and to describe the steps Oliveti Construction Limited is taking to ensure it complies with it. This control applies to all systems, people, and, processes that constitutes the organisations information systems including directors, employees, suppliers and other stake holders who have access to Oliveti Construction Limited's systems.

2. Privacy Policy

2.1. GDPR

The General Data Protection Regulations 2016 (GDPR) is one of the most significant pieces of legislation affecting the way in which organisations carry out its information processing activities. Significant fines are applicable if a breach is deemed to have occurred under the GDPR, which is designed to protect the personal data of the citizens of the European Union. It is Oliveti Construction Limited's policy to ensure that our compliance with the GDPR and other relevant legislation is clear and demonstrable at all times.

2.2 Definitions

There are 26 definitions listed within the GDPR however the most fundamental definitions with respect to this policy are listed below:

Personal Data

'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Data Controller

'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

Data Processor



‘processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

The full list of GDPR definitions can be found at <https://gdpr-info.eu/art-4-gdpr/>

2.3 Who is the Organisation’s Data Controller?

Olivet Construction Limited is the Data Controller and as such is the party which decides what personal information/data is collected from a data subject. Address: Stonecroft House, Ervington Court, Meridian Business Park, Leicester, LE19 1WL, Company Registration No. 4341581.

2.4 Who is the Organisation’s Data Processor?

Construction Industry Solutions are the data processor for Oliveti Construction Limited. Address: COINS Building, 11 St Laurence Way, Slough, Berkshire SL1 2EA, Company Registration No. 02039252.

2.5 Contact Information for the Organisation’s Data Controller?

You can contact the Data Controller using the following methods:

Write to:	Olivet Group Limited Stonecroft House Ervington Court Meridian Business Park Leicester LE19 1WL
Call:	0116 2777771
Email:	info@oliveticonstruction.co.uk
Website:	http://www.oliveticonstruction.co.uk/ - use the ‘Contact Us’ tab

2.6 Principles Relating to Processing of Personal Data

There are a number of fundamental principles upon which the GDPR is based. These are as follows:

1. Personal data shall be:
 - a) processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
 - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes (‘purpose limitation’);



- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
 - d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
 - e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
 - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').
2. The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability').

Oliveti Construction Limited will ensure that it complies with all of these principles both in the processing it currently carries out and as part of the introduction of new methods of processing such as new IT systems.

3. Fair Processing of Your Personal Data

Any personal information that you provide will be collected, processed and stored in accordance with the GDPR. It will be used by us and data processors to deliver and improve services and fulfil our statutory and contractual duties. We will not disclose any personal information to any other third parties unless required to do so by law.

3.1 The Legal Basis for Processing Your Information

We are responsible for collecting and processing your personal data on a legal basis of Legitimate Interests. This means the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

The legitimate interests pursued by both the organisation and its data processors are:

- To offer products and services to our employees, subcontractors, suppliers and clients.

3.2 What Personal Data do we Process



We have a duty to collect and process sufficient personal information about you to enable us to provide services and fulfil our legal and contractual responsibilities. This can include:

- **Personal information** such as your name, postal address, contact telephone numbers, personal email addresses etc.
- **Financial information** such as bank account, credit card, and direct debit details of you or your business.
- **Employment Information** such as current or previous company name, company address, company contact telephone numbers and email addresses.
- **Special Category Data.** Some data is called special category data which is more sensitive, and we have to look after it more carefully. This includes details of ethnic origin, religious beliefs, sexual orientation, trade union membership, health data, and biometric (e.g. fingerprints, facial recognition) and genetic (e.g. DNA) data. If we wish to pass your sensitive personal data onto a third party, we will usually only do so once we have obtained your consent, unless we are legally required to do so.

3.3 Why we collect and Process Your Personal Information

We will collect and process your personal information for the following reasons:

- To employ staff and monitor equality
- To carry out obligations arising from any agreements entered between you and us, and to provide you with information, products and services that you request from us
- To provide you with information about other goods and services we offer that are like those you have already purchased
- To administer internal operations such as data analysis, testing, research, statistical and survey purposes
- To communicate with you to gain feedback about our organisation, products and services

3.4 How we collect Your Personal Information

We collect, store and use the information you directly provide in a manner that is compliant with the GDPR. We may also collect information about you from family members, associates or beneficiaries of products and services. We may also process information generated about you from business partners such as financial services institutions or insurers, account beneficiaries or others who are a part of providing your products or services or operating our business.

3.5 How We Store and Secure Your Personal Data

We will always try and keep your personal data secure, whether it is held in paper format or electronically. We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change, or damage.

3.6 Sharing your Personal Data with Other Organisations

We may share your personal information with any member of our group including its subsidiaries. In order to provide you with the services or products you require there may



be occasions when your information is shared with those who carry out work on our behalf such as business partners, suppliers, and subcontractors for the performance of any agreement we enter with them or with you. We may also share your information with Government departments such as HMRC, Contractors providing IT services, and pension providers if necessary. These providers are obliged to keep your details safe and secure, and use them only to fulfil your request. If we wish to pass your sensitive personal data onto a third party, we will usually only do so once we have obtained your consent, unless we are legally required to do so.

3.7 Sharing Your Personal Data outside the United Kingdom or the European Economic Area

Your personal data will not be transferred outside of the United Kingdom (UK) or the European Economic Area (EEA).

3.8 Retention Periods for Your Personal Data

We will only hold your personal data for as long as necessary. Unless we otherwise explain to you we will hold personal data based on the following criteria:

- For as long as we have reasonable business needs such as managing our relationship with you and managing our operations;
- For as long as we provide information, products and/or services to you and then for as long an individual can bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance

3.9 Deletion/Destruction of Your Personal Data

We will take great care to ensure your personal data has been securely destroyed or deleted when no longer required or as per your request. The following methods of data destruction apply to our organisation:

- ***Data held in paper format*** - Data held in paper format will be shredded once no longer required.
- ***Data held in an electronic format*** - Electronic data will be deleted from all computer systems where it has previously been stored.

3.10 Changes of Your Personal Data

We are required to ensure your personal data is correct and accurate. Should your personal information change at any time please contact us using any method listed in section 2.5 of this Privacy Policy.

4. Rights of the Individuals

The GDPR includes the following rights for individuals:

- **The right to be informed**
Oliveti Construction Limited provides fair processing information by way of this Privacy Policy.
- **The right of access**



You have the right to obtain confirmation about how we are processing your personal data and what data we hold about you. You can request a copy of the data held about you by using the methods described in section 2.5 of this Privacy Policy.

- **The right to rectification**
If we hold inaccurate or incomplete information, you have the right to have that information corrected or completed.
- **The right to erasure (also known as “right to be forgotten”)**
You have the right for your information to be erased. We will remove or erase your information on request if there is no compelling reason for us to keep it, such as for the ongoing administration in relation to any arrangement with us.
- **The right to restrict processing**
You have the right to restrict or block processing, this will not affect the processing that has been done so far, but will stop further processing. When processing is restricted Construction Industry Solutions are permitted to store your personal data, but not to process it any further. The organisation can retain just enough information about you to ensure the restriction is repeated in the future.
- **The right to data portability**
You have the right for your information to be provided in a machine-readable format to enable easy transfer between processors. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- **The right to object**
You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests.
- **The right not to be subject to automated decision making including profiling**
We do not perform automated individual decision-making (making a decision solely by automated means without any human involvement); and

Profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

Each of the rights mentioned in section 3 are supported by appropriate procedures within Oliveti Construction Limited that allow the required action to be taken within the timescales stated in the GDPR. Should you wish to exercise the rights detailed above please contact us using the methods detailed in section 2.5 of this Privacy Policy.

These timescales are shown in table 1 below:

Table 1:

Data Subject Request	Timescale
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month



The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
The right not to be subject to automated decision making including profiling	Not specified

To find out more about your information rights visit the website of the Information Commissioner at: www.ico.org.uk

4. Amendments and Updates to our Privacy Policy

We may amend and update this Privacy Policy from time to time in order to reflect changes in law and/or the organisation's privacy practices. This Privacy Policy was last updated April 2018.