



Data Protection Policy



BACKGROUND

In order to operate efficiently, Rydon has to collect and use personal information about people whom it employs, provides a product or service and works with. These people may include current, past and prospective employees, sub-contractors, members of the public, clients, customers and suppliers. In addition, it may be required to collect personal information in order to comply with taxation, legal and other regulatory obligations.

In collecting and using such information, Rydon are committed to protecting the rights and privacy of the Data Subject in accordance with the provision and principles of the General Data Protection Regulations (GDPR).

Rydon understands the importance of respecting individuals' personal information and is committed to abiding by both the spirit and the letter of GDPR.

The purpose of this policy is to enable Rydon to:

- comply with the law in respect of the data it holds about Data Subjects;
- follow good practice;
- protect Rydon staff, clients and other individuals associated with our business.

DEFINITIONS

Personal Data is any information that relates to a living individual who can be identified from that information.

Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

Data Subject means an individual who is the subject of Personal Data.

Data controller means a person who (either alone or jointly or in common with other persons) determines the purposes and manner in which any Personal Data are, or are to be,

processed.

Special Categories of Personal Data means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

Criminal records data means information about a Data Subject's criminal convictions and offences, and information relating to criminal allegations and proceedings.

Data Processor, in relation to Personal Data, means any person (other than an employee of the Data Controller) who processes the data on behalf of the Data Controller.

Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes and manner in which any Personal Data are, or are to be processed.

This policy relates to information either collected, stored or processed in any of the Rydon Group companies including; Rydon Homes, Rydon Maintenance, Rydon Construction and Ryhurst.

The information we hold will only be used where we have a legitimate interest or for contractual reasons.

POLICY

Whenever collecting information about people, Rydon agrees to apply the following principles which reflect and address those contained in GDPR.

- The organisation processes Personal Data lawfully, fairly and in a transparent manner.
- The organisation collects Personal Data only for specified, explicit and legitimate purposes.
- The organisation processes Personal Data only

where it is adequate, relevant and limited to what is necessary for the purposes of processing.

- The organisation keeps accurate Personal Data and takes all reasonable steps to ensure that inaccurate Personal Data is rectified or deleted without delay.
- The organisation keeps Personal data only for the period necessary for processing.
- The organisation adopts appropriate measures to make sure that Personal Data is secure, and protected against unauthorised or unlawful processing and accidental loss, destruction or damage.

Rydon will advise Data Subjects the reasons for processing their Personal Data, how it uses such data and the legal basis for processing in its privacy notices. It will not process Personal Data of Data Subjects for other reasons.

Where the organisation relies on its legitimate interests as the basis for processing data, it will carry out an assessment to ensure that those interests are not overridden by the rights and freedoms of the Data Subjects.

Where Rydon processes special categories of Personal Data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with the Background Screening Policy.

Where we are a Data Processor we do so under an appropriate contractual framework in order to provide services on behalf of the Data Controller.

Where we are a Data Controller we have appropriate technical and organisational measures to ensure and demonstrate that processing is performed in accordance with GDPR.

INDIVIDUAL'S RIGHTS

YOUR RIGHTS RELATING TO YOUR DATA?

The Rydon Group is committed to respecting your rights in respect of your personal data. The GDPR provides the following rights for individuals:

THE RIGHT TO BE INFORMED

We will be open and transparent about how and why we

use your personal information. We do that as far as we can through our privacy notices.

THE RIGHT OF ACCESS

You have a right to ask to see the personal information we hold about you and ordinarily the right to have a copy provided to you or someone else on your behalf. A request to see this information is known as a 'subject access request' ("SAR").

SARs are preferred by email to dataprotection@rydon.co.uk and we ask that your request be accompanied by proof of your address and identity. If you require specific information, it is helpful if this is clear in your request. If someone is requesting information on your behalf, they will need written confirmation from you to show you consent for us to release this and proof of ID (both yours and theirs).

Where Rydon Group is the Data Controller will provide a copy of the information requested **free of charge**. However, we can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We will seek to provide you with the information you have asked for within one month, although in certain circumstances it may take longer to provide you with some or all of the information you have asked for and we will try to keep you updated about this as promptly as we can. The data provided to you will be a copy of the personal data we hold that relates to you, this will not generally include information about your property, for example, repairs logs or contractor visits, as this is unlikely to constitute your 'personal data'.

THE RIGHT TO RECTIFICATION

You can ask us to correct your personal data if it is inaccurate or incomplete. Please help us to keep our records accurate by informing us if your details change.

THE RIGHT TO ERASURE

This is also known as 'the right to be forgotten'. In some circumstances, you can ask us to consider deleting or removing personal data or to tell us that you object to our processing of your information where there is no compelling reason for this to continue. However, we will need to consider the circumstances of any such request

and balance this against our need to continue processing the data and in line with our legal obligations.

THE RIGHT TO RESTRICT PROCESSING

In some circumstances, you may ask us to restrict the processing of your personal data.

THE RIGHT TO DATA PORTABILITY

This right allows you to obtain your personal data from us and reuse it for your own purposes for different services. If this situation arises, you may be able to ask us to do this.

THE RIGHT TO OBJECT

You can inform us if you object to our processing of your personal data.

You can also object to the processing of data for the purpose of direct marketing (including profiling).

RIGHTS IN RELATION TO AUTOMATED DECISION MAKING AND PROFILING

In certain circumstances, you have the right not to be subject to decisions being taken solely on the basis of automated processing.

All requests to access such information will be handled in accordance with GDPR.

If you believe that Rydon has not complied with your data protection rights, you should raise your concern with us in the first instance or directly with the Information Commissioners Office at <https://ico.org.uk/make-a-complaint/>

REGISTER OF DATA CONTROLLERS

The Information Commissioner maintains a public register of individuals and organisations which hold and process Personal Data, known as Data Controllers. All Rydon Group Companies are registered as Data Controllers with the Information Commissioner.

DATA SECURITY

Rydon takes the security of Personal Data seriously. Rydon has internal policies and controls in place to protect

Personal Data against loss, accidental destruction, misuse or disclosure and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where Rydon engages third parties to process Personal Data on its behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

DATA BREACHES

If Rydon discovers that there has been a breach of Personal Data that poses a risk to the rights and freedoms of the Data Subject, it will report it to the Information Commissioner within 72 hours of discovery.

Anyone suspecting a data breach should immediately alert DataProtection@Rydon.co.uk.

If the breach is likely to result in a high risk to the rights and freedoms of the Data Subject, Rydon will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

DATA RETENTION

Rydon retains personal information only for as long as necessary to carry out its legitimate business functions and in line with our retention schedule and any over-riding statutory/legislative requirements.

DATA SUBJECT RESPONSIBILITIES

Data Subjects are responsible for helping Rydon to keep their Personal Data up to date. Individuals should let Rydon know if data provided to the organisation changes, for example if an individual moves house or changes their bank details.

TRAINING

Rydon will provide training to all our employees about their data protection responsibilities as part of the employment induction and on boarding process.

Individuals whose roles require regular access to Personal Data, or who are responsible for implementing this policy or responding to subject access requests under this policy,

will receive additional training to help them understand their duties and how to comply with them.

INDIVIDUAL PRIVACY NOTICES

Rydon have Privacy notices for the following categories of Data Subject. We may add to this list as there are many reasons for processing data from other categories of Data Subject.

- Privacy notice for Residents - Householder
- Privacy notice Business to Business contacts
- Privacy notice Prospect or Purchaser
- Privacy notice Sole Trader
- Privacy notice for Employees

Rydon keeps its privacy notices under regular review and reserves the right to change or update them as appropriate.

CONTACTING RYDON

By Email: DataProtection@Rydon.co.uk

In Writing:

The Legal Department
Rydon House
Station Road
Forest Row
East Sussex
RH18 5DW

GOVERNANCE

This policy covers any Personal Data collected or processed in relation to Rydon business activities by employees or associated contracted third parties.

This policy is communicated and made available as appropriate or on request.

Company policy is approved by the Group Board which is chaired by the Chief Executive. Each policy is reviewed at least annually to ensure that we respond to business strategy, client and customer requirements, legislation and statute and any relevant or required standards or codes of practice.

Oversight of the Data Protection Policy is the responsibility of the Group Human Resources Director.

Signed on behalf of Rydon Group

Signature removed for security reason

(Signed copy available on request)

Signed:

Group HR Director

Dated: September 2019