



# Data Protection (GDPR) Policy

## 1. Introduction

- 1.1 This policy applies to Briggs & Forrester (UK) Limited on its own behalf and on the behalf of all its subsidiary companies within the Briggs & Forrester Group Ltd ('the Group'): Briggs & Forrester Engineering Services Ltd, Briggs & Forrester Living Ltd, Briggs & Forrester Special Projects Ltd, Briggs & Forrester Building Services Maintenance Ltd and Briggs & Forrester (Holdings) Ltd.
- 1.2 The Group specialises in the design, installation, project management, testing and commissioning of building engineering services and maintenance services.
- 1.3 The Group operates UK wide on varying sizes of projects including public and private sectors, schools, hospitals, government agencies, local authorities, industrial, commercial, and residential properties.
- 1.4 The Group are fully committed to protecting and maintaining your privacy and comply with data protection laws that are applicable in respect of data processing within the UK.
- 1.5 The Group determines the purposes and the methods by which personal data is processed.
- 1.6 This privacy notice sets out how the Group collects, uses, stores, and protects your personal information and your rights in relation to your information.

## 2. Information that may be collected from you

- 2.1 To facilitate your interest in the Group, the following data may be collected and processed about you:
  - Personal data when you actively enquire about services
  - Name, place of work, position
  - Contact information including email address and any telephone or mobile telephone number
  - Postal address
  - Your interests and motives behind your interaction with the Group
  - The method in which you found the Group website
  - Various information collected and stored by third party cookies
- 2.2 The information that is processed about you is dependent on the purpose and channel of your enquiry. This includes but is not limited to:
  - Enquiries for more information about the Group, it's goods and services
  - Job applications
  - Tenders
  - To fulfil a contract the Group has with you or your business
  - Information provided through the Group's mobile applications
- 2.3 For employees, agency workers and sub-contractors of the Group, the Group has contractual and legal obligations to fulfil to collect and process personal data in relation to administering these relationships, which includes but is not limited to:



- Personal details to process payroll, pensions, insurances, training and any related activities
  - Next of kin detail
  - Time and attendance including biometric systems
  - Health and safety records
- 2.4 Some types of personal data are defined as special. The Group will only collect and use these types of data if the law allows it to:
- Health data
  - Criminal convictions data
- 2.5 The Group does collect and use such special data to comply with contractual and/or legal obligations. This may be to:
- Establish, exercise, or defend legal claims.
  - Register staff to work in certain premises or types of premises (e.g., military, government, prisons or similar secure establishments, schools, hospitals, or other places where vulnerable people may be present).
  - At induction to establish or identify factors that allow the Group to provide and manage a suitable working environment either at its own premises or as obligated at client or other premises.
  - Review driver licence endorsements and health matters which impact on an entitlement to drive.
  - Manage private medical insurance and other life or sickness benefit insurance schemes.
- 3. Information the Group may collect from others**
- 3.1 Data from third parties that the Group works with, including but not limited to its clients, suppliers, agencies and subcontractors, companies that introduce you to the Group, information from publicly available resources etc.
- 3.2 Driving records from the DVLA, CRB checks from the Disclosure and Barring Service, HMRC notices etc.
- 4. How your information is used**
- 4.1 The Group will use the information held about you for the purposes for which it was provided to the Group as stated at the point of collection (or as may be obvious in the context of collection).
- 4.2 Your personal data will be used by the Group in the following ways:
- To respond to your enquiries
  - To send you information you have requested
  - To improve its business and the service and/or products provided
  - To manage its operations and business in an efficient and proper way
  - To facilitate any interest in a career with the Group
  - To verify your identity where this is required
  - To maintain records to comply with HMRC and other legal and contractual requirements
  - To process financial transactions to employees, its supply chain or any other party where it has a contractual relationship



- To collect and recover money that it is owed
- To exercise its rights set out in contracts and agreements
- To prevent and detect crime, fraud, or corruption
- For market research purposes

4.3 The Group do not collect or compile personal data for release or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties.

4.4 The Group must have a legal reason to process your personal information. Your information will be processed to meet its legitimate contractual and legal requirements and to facilitate your interest in or interaction with the business. In those few cases where your consent is required, this will be communicated to you at the point of collection (for instance by tick boxes on the Briggs & Forrester website).

## **5. Information storage and retention**

5.1 The Group has security measures in place to protect your personal information and keep it confidential. These measures are regularly reviewed to make sure they remain appropriate.

5.2 The Group cannot guarantee the security of any third-party application you may use to transmit your data (for example, internet browsers).

5.3 The Group will keep your personal information for at least as long as it has a relationship with you.

5.4 When deciding how long to keep your personal information a relationship with you has ended, the Group's legal, regulatory, insurance, contractual and professional obligations are taken into account. Personal information not pertinent to those obligations will be destroyed if so requested.

## **6. Disclosure of your information**

6.1 The Group may disclose your personal data:

6.2 To any member of its Group who need access to that information to assist you with the purpose of your enquiry.

6.3 To third parties:

- That are engaged by the Group to provide it services, (for example but not limited to its vehicle fleet, insurance, and pension matters). In which case the Group will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to the Group.
- If so required to identify you to clients or others where you are required to attend or have access to their premises
- If the Group or substantially all its assets are acquired by a third party. In which case personal data held by the Group's site will be one of the transferred assets
- If the Group are under a duty to disclose or share your personal data to regulatory or law enforcement agencies.

## **7. Links to other websites**

7.1 The Group website and apps may, from time to time, contain links to other websites, mainly those of its partners and clients, but also those of other third parties. Please note that these websites have their own privacy policies and that the Group does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



## **8. Your rights**

- 8.1 You have rights regarding your personal information, including the right to access, correct, delete, restrict, or object to the Group's use of it. The Group encourages you to inform it if the information held about you is no longer accurate. Extra information may be needed from you to deal with any request. If you would like to discuss or exercise these rights, please contact the Group at [GDPR@briggs.uk.com](mailto:GDPR@briggs.uk.com)
- 8.2 If you do not want the Group to process your data, then it may not be able to facilitate your interest in the business.
- 8.3 In the event that you have cause for complaint please contact the Group who will follow up with you to resolve this. If you have a data privacy related complaint, you also have the option to direct your complaint to the Information Commissioner's Office (ICO):
- Online: <https://ico.org.uk/global/contact-us/email/>
- Phone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

## **9. Cookies**

- 9.1 Cookies are ways of saving a small amount of information. They are automatically downloaded to your device when you visit a website. The Group website uses cookies to distinguish you from other users of the website. This helps to provide you with a good experience when you browse the website and allows the Group to improve the site. For detailed information on the cookies used on the website and the purposes for which these are used see the Group's Cookie policy.

## **10. Contacts**

- 10.1 Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to [GDPR@briggs.uk.com](mailto:GDPR@briggs.uk.com).

## **11. Communication of this policy**

- 11.1 A full copy of this policy is accessible to all interested parties via the Group website.
- 11.2 All new direct employees are required to read and understand the requirements of this policy.
- 11.3 All new direct employees are required to complete the Data Protection UK training module via the learning management system.

## **12. Review and updating of this policy**

- 12.1 This policy will be reviewed and updated annually and amended as necessary to reflect any changes to the Group, its management systems, or relevant legislation.
- 12.2 The Group's Senior Management Team continually monitor this policy's procedures to ensure compliance and continual improvement. All reports, reviews and results of monitoring processes will be recorded, and records retained.

**Paul Burton**  
Group Chairman and Chief Executive