

## DATA PROTECTION POLICY

### 1. INTRODUCTION

This document sets out the Mison Construction policy on the protection of the personal data of all business contacts – primarily customers (actual and potential) and service/product providers (actual and potential).

### 2. DEFINITIONS

Data Subject – The individual who the data in question relates to, and who may be identified by the data.

GDPR – The European Union’s General Data Protection Regulation.

HMRC – The UK’s tax regulator.

The Company – Mison Construction Ltd, registered office: Unit 3, Weavers Court, Linfield Road, Belfast, Bt12 5GH

Organization – This includes both commercial businesses and not-for-profit organizations.

The Company Server – A secure internal server accessible by Mason’s team members.

### 3. GDPR ROLES

Olga Mccrossan, Accounts Director, is a nominated Data Protection officer. Olga Mccrossan also act as a Data Controller and the Data Processor for Mison Construction.

### 4. TYPES OF DATA

As part of the running of Mison Construction, the company obtains contact details of individuals (clients, prospects, service providers etc., as stated in Section 1). These individuals may be acting alone or as part of an organization.

These details are primarily email addresses, telephone numbers and postal addresses, but could also include LinkedIn information and other contact details. These details may be within the scope of GDPR if, and only if they can be used to identify named individuals.

For this policy, contact details that can be identified only with organizations, or with groups etc. within organizations (for example, a company office address or group email address), are assumed to be outside the GDPR's scope.

Mison Construction limited does not actively collect or store 'sensitive personal data' as defined in the GDPR, such as ethnic origin or religious or political beliefs. If such data is contained within a document that the company is asked to work on:

- Mison Construction Ltd will not use or share data in any way, other than sharing the document, as necessary, with other parties involved in the project.
- Mison Construction Ltd will delete the document if requested to do so by the client or Data Subject, after the work is completed.

## 5. COLLECTING DATA

### 5.1 POSTAL ADDRESSES

To comply with HMRC's requirements, The Company needs to obtain a postal address for each client or supplier that Mison Construction operates with, to be included in invoices that are issued.

For future reference, The Company may store this postal address in a list of client details on the Company Server if it relates to an organization, or group etc. Within an organization, but not if it is

an individual's address. In either case, The Company may include it in the contacts list in an email account, if The Company thinks it may need it for potential future invoices.

## 5.2 EMAIL ADDRESSES

As part the email correspondence, email addresses are automatically recorded in the email accounts that are used by Mison's employees.

When researching potential clients, service providers etc., The Company may store individuals 'company – based' email addresses in spreadsheets if, and only if, The Company has obtained them from publicly available sources (such as a company website).

The Company website does not have a login system for visitors. The Company does not collect email addresses via the website, other than those that are automatically added to a list when visitors contact The Company and specify their email addresses – The Company does not process this data or store it elsewhere.

## 5.3 OTHER PERSONAL DATA

As part of normal business communication, individuals' telephone numbers may be stored (automatically or manually) in the contacts list on The Company's mobile phones or landline phones.

A number that is stored on The Company mobile telephones might be automatically synchronized into the contacts list in an email account associated with that phone. The Company might also add it to one of these contacts lists manually, if The Company thinks this will help to contact the person.

## 6. USE OF DATA

The Company believes that Mison's use of the above data is compliant with GDPR, as The Company uses it for contacting people within organizations or groups about work and related matters, and (as

per section 5.1) to include postal addresses in invoices. In GDPR terms, The Company believes these to be a 'lawful basis' for use of the data.

## 7. SECURITY OF DATA

The data referred to in the above sections is stored on The Company computers that are used by Mison's staff members, within The Company Server and on the shared Drive. The Company computers require a password on start up. If work is undertaken off site, The Company staff members will require a password to access The Company Server.

The Company email accounts are password protected, and The Company mobile telephones requires a PIN upon start-up and wake-up.

## 8. RETENTION OF DATA

As required by HMRC, The Company retains each postal address (at least in invoices, and sometimes also in The Company's spreadsheet of client details, as per section 5.1) for at least six years from the date when it was last used. After that, it will be deleted on request from the client, or it may be deleted as part of a 'housekeeping' exercise.

## 9. WEB ANALYTICS

The Company sometimes uses Google Analytics to assess how web users have generally been finding and navigating The Company website; however, The Company does not use it to identify individual visitors.

## 10. SHARING OF DATA WITH THIRD PARTIES

The Company will not share personal data with any other parties without the Data Subject's consent, unless it needs to be shared with HMRC for tax audit purposes.

## 11. CONSENT AND AWARENESS

The Company will ask the client to state that they accept the terms of this policy unless they have already done so. The work will not proceed unless this acceptance is explicitly stated.

The Company will not ask past, inactive clients for retrospective acceptance of this policy; The Company will only ask them about it if they offer The Company further work.

The Company does not believe that, in normal circumstances, there is a requirement for other types of contacts (prospects, service providers etc.) to state their acceptance of this policy.

If someone sends The Company an electronic document containing contact details (for example, a potential supplier or subcontractor), The Company will not be obliged to delete the document or redact those details, as they will have been supplied to The Company voluntarily. However, The Company will delete the document or redact the details on request from the document provider or Data Subject, unless this would prevent The Company satisfying any legal requirements.

For organizational clients, consent may be given by either (a) a primary contact in the organization, (b) another person in a suitable position of authority, or (c) the Data Subject.

The Company will record all instances given or withdrawing consent in a log on The Company Shared Drive.

## 12. RIGHTS OF THE DATA SUBJECTS

The Company acknowledges and respects the rights afforded to Data Subjects under the GDPR, including the rights:

- To be told, on request, what data The Company can hold about them.



Unit 3, Weavers Court, Linfield Road,  
Belfast BT12 5GH  
T: +442890 224014  
E: info@mison.co.uk  
W: www.mison.co.uk

- To ask for data to be updated, deleted, restricted or moved to another party without hinderance, subject to legal requirements.
- To complain to the Information Commissioner's Office about any alleged misuse of data.

Following any request to update, delete, restrict, or move data, The Company will give an initial response within 15 days if possible, and (if it goes ahead) carry out the requested action within 30 days. If necessary, The Company will delete relevant emails as well as deleting data from files.

### 13. RESPONDING TO DATA BREACHES

In cases when Mison Constructions will become aware of a possible breach of data protection within the Company, it will be investigated. If the Company finds that a breach has occurred and could result in a risk to anyone's privacy rights or freedoms, The Company will report it to the Information Commissioner's Office within 72 hours of determining this.

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**Mison Construction Ltd**

Unit 3, Weavers Court

Linfield Road

Belfast, BT12 5GH

+442890 224014

E: info@mison.co.uk

W: www.mison.co.uk

Signed *Volha McCrossan* Director

Print name *Volha McCrossan*

Dated *14/01/2019*