



### C Jones & Sons – Data Protection Policy

#### Company Name: C Jones & Sons

Address: Unit 1, Jacks Park, Cinque Ports Road, New Romney, TN28 8AN

Sector: Construction

Policy Version: 1.0

Date: October 2025

Approved by: Zach Jones (Director)

#### 1. Purpose

This policy outlines how C Jones & Sons (“the Company”) collects, uses, stores, and protects personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The Company is committed to handling personal data responsibly and ensuring that the rights and privacy of individuals are respected.

#### 2. Scope

This policy applies to all employees, subcontractors, and directors of C Jones & Sons, as well as all personal data held about employees, clients, suppliers, and other third parties, in any format (electronic, paper, or verbal).

#### 3. Data Protection Principles

C Jones & Sons will ensure that all personal data:

1. Is processed lawfully, fairly, and transparently.
2. Is collected for specific, explicit, and legitimate purposes.
3. Is adequate, relevant, and limited to what is necessary.
4. Is accurate and kept up to date.
5. Is kept only for as long as necessary.
6. Is processed securely using appropriate technical and organisational measures.

#### 4. Lawful Bases for Processing

The Company will only process personal data when at least one of the following applies:

- The individual has given consent.
- Processing is necessary for the performance of a contract.
- Processing is required for legal obligations (e.g., tax, employment law).
- Processing is necessary to protect vital interests of an individual.
- Processing is necessary for the legitimate interests of the Company.

#### 5. Types of Personal Data Collected

Examples include:

- Employee data: names, contact details, bank details, NI numbers, qualifications, and emergency contacts.
- Client and supplier data: contact details, site addresses, and invoicing information.
- Health and safety data: incident records, training certificates, and site access details.



## 6. Data Storage and Security

- Electronic records are stored securely on password-protected systems and backed up regularly.
- Paper records are kept in locked filing cabinets with restricted access.
- Access to personal data is limited to authorised personnel only.
- Portable devices are encrypted and password protected.
- Data is deleted or shredded when no longer required.

## 7. Data Sharing and Transfers

Personal data may be shared with third parties only when necessary for business or legal reasons, including:

- Payroll and HR providers
- Insurers and accreditation bodies (e.g., CHAS)
- Regulatory authorities when required by law

The Company ensures that all third parties comply with UK GDPR requirements and maintain confidentiality.

## 8. Data Retention

C Jones & Sons retains personal data only for as long as necessary:

- Employee records: 6 years after leaving employment
- Financial records: 7 years for HMRC purposes
- Health and safety records: 3–40 years (depending on statutory requirements)

Data is securely deleted or destroyed after the retention period.

## 9. Individual Rights

All individuals have the following rights under data protection law:

- Access to their personal data
- Rectification of inaccurate data
- Erasure ("right to be forgotten")
- Restriction of processing
- Data portability
- Objection to processing

Requests should be made in writing to the Data Protection Officer (DPO) via the contact details below.

## 10. Data Breaches

Any data breach or suspected breach must be reported immediately to the DPO. The DPO will assess the breach, record details in the breach log, notify the ICO within 72 hours if required, and inform affected individuals where necessary.

## 11. Roles and Responsibilities

- Directors: Ensure compliance and oversight of this policy.
- All Employees: Handle personal data securely and report any breaches.
- Data Protection Officer (DPO):  
Name: Daniel McAvoy





Email: [info@cjonesandsons.co.uk](mailto:info@cjonesandsons.co.uk)

Role: Ensure compliance, respond to access requests, and advise on data protection matters.

### 12. Training

All staff receive data protection awareness training during induction and periodically thereafter. Refresher training is provided when there are significant changes to legislation or company procedures.

### 13. Policy Review

This policy will be reviewed annually or following any significant changes in legislation or company operations.

Next Review Due: October 2026

Signed:

Name: Zach Jones

Position: Director

Date: 01/10/2025

OWNERS OF BILT. BUILDERS MERCHANT

