



## Privacy Policy

### RESPONSIBILITIES

The Company Directors of Genco Construction Services Ltd (hereafter referred to as Genco); **Mr John Roberts & Mr Robert Russell** are responsible for ensuring that the Privacy Notice is correct and that mechanisms exist such as having the Privacy Notice on our website to make all data subjects aware of the contents of the notice prior to the collection of data. Our staff and sub-contractors who collect, process and use our customers personal data are required to understand our Privacy Policy and follow our internal procedures.

### PROCESSING

Before any processing takes place, Genco identifies the legal basis for processing personal data by clearly establishing, defining and documenting the specific purpose, i.e. contractual obligation, legal obligation, consent or legitimate interest.

When personal data is contractual or legally required for processing, Genco can process the data without consent in order to fulfil its contractual/legal obligations. When consent or legitimate interest is the basis for collecting personal data, Genco is transparent in its processing and ensures the data subject is aware of the following:

1. Genco Ltd.'s identity, and contact details,
2. The purpose(s) for the intended processing of personal data,
3. The process the personal data goes through,
4. Any information regarding the intention to disclose the data to selected third parties and if the data will be transferred outside of the EU,
5. Any information on website technologies that are used to collect personal data,
6. Any other information required to demonstrate that the processing is fair & transparent.

All information provided to the data subject will be in an easily accessible format, using clear and plain language. When personal data has been obtained from a source other than the data subject (i.e. publicly accessible source, such as a website) the data source will be recorded.

### DOCUMENT OWNER & APPROVAL

Genco are the owners of this document and are responsible for ensuring that this policy document is reviewed in line with the requirements of the EU's GDPR.

John Roberts  
Director

Dated: July 2023

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# Privacy Notice

This privacy notice explains what to expect from Genco when you contact us or use our services. This notice will explain how we collect, use and protect your personal data, and what rights you have with regards to your personal data and how you can exercise those rights.

## Who We Are?

We are Genco Construction Services and for the purpose of this document we are also known as 'the data controller', (as identified with GDPR legislation) meaning that we determine what data is collected, how the data is used and how the data is protected. Our registered address is:

**Unit 13, Orchard Industrial Estate, Christen Way, Maidstone, Kent, ME15 9YE**

The Company Directors of Genco Construction Services: **Mr John Roberts & Mr Robert Russell** are responsible for ensuring that the privacy notice is correct, and that the privacy notice is displayed on our website so that you are aware of the contents of this notice prior to the collection of your personal data. All our staff that are tasked with collecting and processing personal data are required to understand our Privacy Policy and follow our internal procedures.

If you have questions about how we process your personal data, or you would like to exercise your data rights, **please contact enquiries@gencocs.co.uk or call 01622 623000.**

## Why we collect your personal data

The personal data we process is provided directly by you for one of the following reasons;

1. You are a **customer** who has requested our services,
2. You are a **contractor/individual** who provides us with a service,
3. You are a **supplier** who wishes to sell your products/services to us,
4. You **subscribe** to our e-newsletter
5. You either **work for us** or have **applied for a job / work experience** placement with us.

## How we use your personal data

We will use your personal data in the following ways;

1. If you are a **customer** requiring our services, we will use your personal data to correspond with you reference the provision of our services and regarding necessary payment(s),
2. You are a **contractor/individual** who provides us with a service, we will use your personal data to correspond with you reference the provision of your services and regarding payment(s).
3. If you are a **supplier**, we will use your personal data to make purchases from you and regarding necessary payments / receipts,
4. If you **subscribe** to our e-newsletter, you have given us consent to contact you reference news, general announcements, surveys, events and special offers (please note, that once you have opted into this service you can opt out at any time).
5. If you **work for us** or have **applied for a job / work experience** placement with us, we will use your personal data to liaise with you about the position, ensure your safety whilst at work, and for the purpose of payment (as required).

### **How we will keep your personal data safe**

The security of your personal data is very important to us and we are committed to ensuring that your data is as secure as possible. In order to prevent unauthorised access or disclosure, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect.

### **Who we will disclose your personal data with?**

We will securely disclose your personal data in the following situations;

1. If you are a **customer**, who has requested our services, your personal data will be used by our office staff and engineers to provide the product or service and on occasion, your personal data will be passed to a trusted and vetted sub-contractor to provide the product / service on our behalf.
2. You are a **contractor/individual** who provides us with a service, your personal data will be used by our relevant office staff and engineers to liaise with you regarding the receipt of your services.
3. If you are a **supplier**, your personal data will be used solely for the purpose of payment and will be disclosed to our accountant at appropriate times during the financial year.
4. If you **subscribe** to our e-newsletter, we will retain your data for the period of your subscription and for no longer.
5. If you have **worked for us**, your personal data will be used for the purpose of remuneration of your services and in the event of a workplace accident. We will disclose your personal data with our accountants, our CIS Payroll subcontractor, the HMRC and the Health & Safety Executive as appropriate.

Please note that we will **NEVER** give away or sell your personal data to third parties.

### **How long we will retain your personal data**

The length of time we retain your personal data depends on the reason for processing and storing it.

1. If you are a **customer** who has requested our services, we will retain your data for a period of 7yrs following the point of purchase.
2. If you are a **contractor/individual** who provides us with a service, we will retain your data for a period of 7yrs following the last payment made.
3. If you are a **supplier**, we will retain your data for a period of 6yrs in the event of future purchases, or to follow up on a product warranty.
4. If you are **working or have worked for us**, we will retain your data for the duration of your term of employment and up to 1year post your departure. After 1yr the following information will be retained for 7yrs, your contract, number of sick days and payroll. If you have **applied for a job** or been on a **work experience** placement with us, we will retain your data for a period of 3 months after which we will only retain your data, for the purpose of offering you a future position, with your explicit consent.

### **Want to know how you can access, rectify or erase your data**

As the 'data subject', you have rights about the personal data we hold. The rights available to you depend upon our reason for processing your personal data.

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1. **Right to be informed:** You have the right to informed what data we hold about you and how we process and store that data. This should be done in a transparent manner.
2. **Right of access:** You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.
3. **Right to rectification:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.
4. **Right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.
5. **Right to restriction of processing:** You have the right to ask us to restrict the processing of your information in certain circumstances.
6. **Right to object to processing:** You have the right to object to processing of your personal data unless the processing forms part of our public tasks or is in our legitimate interests.
7. **Right to data portability:** This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.
8. **Rights regarding automated decision-making including profiling:** You have the right to be informed if your data is subject to automotive individual decision-making and or the automated processing of data.

#### **How to exercise your rights or make a complaint**

If you have questions about how we process your personal data, or you would like to exercise your data subject rights, **please contact [enquiries@gencocs.co.uk](mailto:enquiries@gencocs.co.uk) or call 01622 623000 and we will aim to respond within 14 days. You will not be required to pay any charge unless an administration fee is charged by a third party in which case this will be passed onto you.**

#### **What else you need to know**

Our website contains links to other sites that are not owned or controlled by Genco. Please be aware that we, Genco are not responsible for the privacy practices of such other sites. We encourage you to be aware when you leave our site and to read the privacy statements of each website that collects personally identifiable information.

**Changes to this Notice:** Genco reserves the right to amend and update the Privacy Notice periodically and will notify those people who have given consent or are under contract of these changes.

#### **Complaints**

If you want to complain about our use of personal data, please send this complaint to us in writing addressed to the Data Protection Officer.

If you are not satisfied with the outcome of your complaint you may also lodge a complaint with the Information Commissioner Office (“ICO), this is the UK data protection regulator. For further information on your rights and how to complain to the ICP, please refer to the ICO website, <https://ico.org.uk/>

Genco reserves the right to amend and update this Policy at any time.



John Roberts

Director

Dated: July 2023