

## Introduction

Global Infrastructure (Scotland) Ltd ("the Company") is committed to meeting the data protection obligations under the General Data Protection Regulations ("GDPR").

The purpose of this policy is to make you aware of how the Company intends to collect, handle, process and store personal data in line with the data protection standards, both during and after the working relationship.

In order to manage the working relationship of the Company it is required to collect and process certain personal information ("data") about individuals.

## Data Protection Principles

GDPR have set out the six main responsibilities that the business must comply with. These state that the personal data we hold must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and where necessary kept up to date.
5. Kept in a form which permits identification to data subjects for no longer than is necessary for the purpose for which those data are processed.
6. Processed in a way that ensures appropriate security of the data.

## The Kind of Information We Hold About You

We will, where applicable, collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date and end date
- Location of workplaces
- Copy of driving licence
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training and competency records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage at main office and work sites

**NOTE: Persons covered under this policy include direct employees (full or part time) personnel supplied by an agency, sub-contractor personnel, suppliers, clients and consultants.**

- Information about your use of our information and communications systems
- Work related photographs

We may also, where applicable, collect, store and use the following “special categories” of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records
- Information about driving or criminal offences

## How We Will Use Information About You

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To fulfil the agreed contract of employment or contract of service.
- Where there is a need to comply with a legal obligation.
- Where necessary for the Company's legitimate business interests providing this does not affect the individuals rights.

Some examples may include:

- To maintain up to date and accurate records.
- To comply with statutory, regulatory obligations such as eligibility to work in the UK by checking birth certificates and or passports.
- Operate and maintain records of personal development, training, annual leave, absence and health.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Education, training and development requirements.
- Ascertaining your fitness to work
- Complying with health and safety obligations.

## Change of Purpose

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## How Your Personal Information Will Be Collected

The Company collects, processes and stores a range of personal information about individuals through the application and recruitment process, either directly from candidates or sometimes from an employment agency.

We may, where necessary, collect additional personal information in the course of job-related activities throughout the period of you working for us.

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## Responsibilities

The following personnel within Global Infrastructure have responsibility for Data Protection:

1. Strategic management to ensure the Company is fulfilling its overall responsibilities  
- Iain C Henderson (Managing Director)
2. Compliance with legal provisions  
- Tanya Bartlet (Business Support Manager)
3. Day to day processing of information  
- Joanna MacLean (Business Support Administrator)  
- Karen Sutherland (Accounts Manager)

However, it should be noted that all employees of Global Infrastructure have a responsibility for ensuring data is collected, processed, stored and handled in accordance with the data protection principles.

## Data Sharing

Personal information may be shared within departments in the business.

The business may also share your personal information with third-party service providers including:

- Occupational health providers
- Pension scheme provider
- External auditors
- Training providers

## Protecting Personal Data and Storage

The Business has put procedures and strict measures in place to minimise the risk of personal information from been accidentally lost, destroyed, altered, disclosed or accessed and used in an unauthorised way. Access is granted on an as required basis to data processors, managers and other third parties who have a business and legal requirement to access personal information to perform their role and responsibilities.

Third parties, are only granted permission to process individuals' personal information for the specified purpose and not for their own purposes.

In the event of a significant impact data security breach the business will notify the Information Commissioners Office and all affected individuals within 72 hours.

All personal data whether it be stored in paper or electronic format will be kept secure at all times (under lock and key or password protected) and may only be accessed by authorised persons. All employees should take care in ensuring the following are adhered to when dealing with personal data:

- Data printouts are collected and not left where unauthorised individuals may see them.
- Data printouts are shredded and disposed of securely when no longer required.
- Electronic data should be protected with a strong password which should be changed regularly.
- The business highly discourages it, but in the unlikely event of data been stored on removable media (eg. CV's and Memory Sticks) these must be kept locked away securely when not in use.

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- Data must only be stored on designated drives, servers and in Office 365.
- If personal data can be accessed via mobile phones whether these be personal or Company phones (this includes business email) then they must be password protected and anti-virus software installed. (Please contact the IT department if you require any assistance with this).
- Data should never be saved directly to laptops, tablets and mobile phones.
- Computers and laptops must be left locked if leaving work stations.

## Retention Period

The Company will only retain personal information for as long as deemed necessary.

Personal information will normally be retained for up to 7 years following termination of employment or engagement. This excludes any Health Surveillance records and these will be retained according to statutory provisions.

All personal information held will be securely and effectively destroyed or permanently erased from IT systems when no longer necessary to be held.

## Your Rights

To keep personal information accurate and up to date the Company will annually request updates from individuals on their personal information via Employee Update, Health Questionnaire and Driver Declaration forms (where applicable).

Although we ask that individuals please keep us informed of any changes as they occur, (eg. Home address, contact number, emergency contacts), the business cannot take responsibility of any errors in your personal information in this regard unless you have notified the business of any changes.

Subject to certain conditions and in some circumstances individuals have a number of statutory rights.

The GDPR includes the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to object to processing

For more information on your rights please visit the Information Commissioner Office website at [www.ico.org.uk](http://www.ico.org.uk). Individuals may also contact the Business Support Manger for further information or if you wish to exercise any of these rights. As a security measure the business may request specific information from individuals in order to verify identity in the event of a request to exercise any of the above rights.

## Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

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## Who to Contact

If you have any questions relating to this policy please contact Joanna MacLean (Business Support Administrator) on 01463 870904.

Information Commissioners Office Registration Reference: ZA327858

This Policy is reviewed annually and has been adopted by Global Infrastructure Ltd on:

Date: 01/04/2019

A handwritten signature in blue ink, appearing to read "Iain Henderson".

Iain C Henderson  
Managing Director

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