



THE GENERAL DATA PROTECTION REGULATION (GDPR) & DATA PROTECTION ACT 2018

C A GROUP PRIVACY NOTICE:

THIS NOTICE PERTAINING PRINCIPALLY TO APPLICANTS, CURRENT & FORMER EMPLOYEES/CONTRACTED WORKERS/SUBCONTRACTORS/CONSULTANTS/AGENCY STAFF, ETC.

Parts are likely to be relevant to other individuals who interact with the C A Group.

The 'Group' as stated herein comprises:-

C A Drillers Ltd; a Limited Company Registered in England, Number 03958270;
C A Fire Protection Ltd; a Limited Company Registered in England, Number 12995327;
C A Telecom UK Ltd; a Limited Company Registered in England, Number 06011062;
and any parent/associate company, past present or future.

The Group is at various times data controller and/or data processor and as such needs to obtain personal data ("Data") relating to you, and to hold and process it and to pass it on to third parties (including but not limited to Banks, HMRC, the Company's clients and the Company's Human Resources/Health & Safety, etc. Consultants and Legal/Financial Advisors).

Types of Data/Lawful Bases

Types of Data which the Group obtains/processes/passes on are set out below, together with the lawful basis on which we do so. Some or all of these may be relevant to you:-

- a. Data which establishes the right to work in the UK. This is a Legal Obligation.
- b. Data which establishes the right to drive (a) motor vehicle(s) in connection with a Group company's business. This is a Legal Obligation.
- c. Data enabling the Company to responsibly manage use of Company vehicles in relation to health and driving record/points/convictions, etc. This is a Legitimate Interest of the Group including but not limited to enabling the Group to fulfil its contractual obligations to its Insurers. (Please see below for more information on Criminal Convictions.)
- d. Data enabling the Group to lawfully put you to work at a Group company's clients' premises and/or at the Group's premises. This is necessary in order that the Group can fulfil its obligations under its contract with you.
- e. Data enabling the Group to obtain quotations for insurance and abide by the terms of such insurance. This is a Legitimate Interest of the Group and in the case of Compulsory Insurances



(e.g. Motor Insurance, Employers liability Insurance) is a Legal Obligation. (Please see below for more information on Criminal Convictions.)

f. Data enabling the Group to comply with Health & Safety legislation (including but not limited to medical information). This is a Legal Obligation.

g. Data enabling the Group to comply with Site H&S Rules and the Company's H&S Rules (including but not limited to medical information). Due to the highly-regulated nature of our industry this is a Legitimate Interest of the Group and of the Group's client.

h. Data enabling the Group to ensure acceptable behaviour in the workplace. This is a Legal Obligation.

i. Data enabling the Group to deal effectively with disciplinary issues and grievances and to properly record the outcome of any disciplinary/grievance process(es) or investigations into alleged breach of contract, etc. This is necessary in order that the Group can fulfil its obligations under its contract with you.

j. Data enabling the Group to comply with statutory requirements (including but not limited to HMRC's Regulations regarding deduction/recording of Tax & National Insurance, Statutory Sick Pay, CSA, etc.) These are Legal Obligations.

k. Data enabling the Group to make payments of wages, salary, etc. into a nominated bank account. This is necessary in order that the Company can fulfil its obligations under its contract with you.

l. Data enabling the Group to verify hours attended/worked (including where applicable, through the use of vehicle tracking and/or by accessing Site Entry System records). This is a Legitimate Interest of the Group; including but not limited to its necessity for the establishment, exercise or defence of legal claims in a Court, Adjudication, Arbitration or Tribunal and/or for the prevention/detection of fraud and/or to enable the Group to fulfil its contractual obligations to its Insurers.

m. Data enabling the Group to ascertain the location of a Group company's vehicle(s) at any particular time in connection with theft, accidents, Police/Local Authority allegations, etc. This is a Legitimate Interest of the Group; including but not limited to its necessity for the defending of prosecutions and/or for the prevention/detection of fraud and/or to enable the Group to fulfil its contractual obligations to its Insurers and/or for the establishment, exercise or defence of legal claims.



n. Data enabling the Group to provide/monitor training. This is necessary in order that the Group can fulfil its obligations under its contract with you.

o. Data enabling the Group to ensure qualifications are adequate & up-to-date. This is a Legal Obligation.

p. Data enabling the Group to monitor performance (for purposes including but not limited to pay/conditions reviews, assessment of bonuses, etc.). This is necessary in order that the Group can fulfil its obligations under its contract with you.

q. Data in relation to accidents which must be passed on to third parties (including but not limited to Police, the HSE, Insurers, etc). This may include:

1. motor accidents (this is a legal obligation),
2. workplace accidents (this is a legal obligation),
3. other (this may be a legal and/or contractual obligation).

r. Data enabling the Group to give references to any potential future employer. This is Data collected in order to enable the Group to fulfil its obligations under its contract with you. It will only be passed on to third parties with your Consent/upon your express request.

s. Data obtained/processed/passed on for any other lawful purpose. Most general correspondence such as e-mails, messages, voicemail, documents, etc. contains Personal Data: even if it is only the name(s) of one or more person(s). The act of you generating correspondence self-evidently shows your Consent that it may be read and passed on in accordance with the Group's Legitimate Interests. Your opening/reading of correspondence which is generated by others and addressed/copied to you indicates your Consent to receive it unless/until you inform the Group otherwise. General correspondence will be destroyed as soon as is practical; other than as stated to the contrary in the Group's Data Protection Policy.

t. Some of the Data referred to above may be Special Category Data. This may include Data which establishes your right to work in the UK (e.g. copy of passport or other I.D. supplied), and any health details/information about Criminal Convictions given. The Group will exercise particular care in processing Special Category Data/Data concerning Criminal Convictions. As far as is reasonably practical, such data will remain under the control of/only be processed by Group companies' Officers/most senior managers. Exceptions may include where specialist/legal advice is sought. Only such Special Category Data as is necessary for the purposes of carrying out the Group's/your obligations and/or exercising the Group's/your specific rights in the field of employment, etc. and/or for the establishment, exercise or defence of legal claims will be obtained/processed/ passed on.



u. Some of the Data referred to above may be obtained during the Recruitment process and the Company will rely on the express Consent given on the Application Form/Medical Questionnaire up to the point where a contract of employment is in place.

v. The Group requests details of Criminal Convictions in accordance with the Rehabilitation Of Offenders Act 1974 and the Rehabilitation Of Offenders Act 1974 (Exceptions) Order 1975. Further, the Group is obliged to obtain/pass on to Insurers details of all motoring convictions (including Criminal Convictions) of any person who will drive (a) motor vehicle(s) in connection with a Group company's business.

w. The Group relies on HM Government's Statement Of Intent on Data Protection dated 07.08.17 in which the Government declares its intention to continue to allow all organisations to process Criminal Conviction data for Insurance purposes and which is enshrined in the DPA.

x. CCTV Images. Images of individuals and/or their vehicles may be captured by CCTV. This is a Legitimate Interest of the Group; including but not limited to its necessity for the prevention/detection of crime and/or to enable the Group to fulfil its contractual obligations to its Insurers and/or for the establishment, exercise or defence of *legal claims*.

Without collecting and processing the Data referred to in this Notice (and where necessary, passing it to appropriate third parties who have demonstrated their GDPR/DPA compliance) the Company will be unable to carry on its business effectively or to pay its employees/workers/subcontractors/Suppliers.

Retention/Destruction of Data

The Group's primary aim at all times is to retain as little Personal Data as possible: destroying it wherever/as soon as is reasonably practical. When it becomes clear that it is no longer necessary to retain Data, the Company undertakes to permanently and completely destroy it in a secure manner. Nevertheless, for the reasons stated herein, the Company may need to hold some of your Data for up to seven years and perhaps for twelve years or more; although the Company aims to securely destroy your Bank Details within 4 weeks of termination of your employment. The Company aims to transfer all Data to a secure archive 6 to 12 months after termination of your employment. Full details on the duration of data retention are available in the Company's Data Protection Policy (a copy of which is available on request).

Automated Decision-Making

The Company does not carry out automated decision-making.

Data Protection Officer/Data Contacts



Neither the Group or any Group company is required to appoint a Data Protection Officer. However, James Amos, Group Chair, is the Group's Data Contact and is the 'first port of call' for all data protection-related enquiries, Data Breach reports, Subject Access Requests & communication of routine concerns. The other Data Contact is Kim Flood, Co. Secretary.

E-mails: jim@cadrillers.com, jim.amos@catelecomuk.com, jim@cafireprotection.co.uk, kim.flood@cadrillers.com, kim.flood@catelecomuk.com, kim@cafireprotection.co.uk.

Data Storage/Movement of Data Abroad

Your Data may be stored in 'the cloud' and this will be hosted by Callout Computers UK Limited. Other than that, your Data will only be transferred abroad in very limited circumstances. These might include where you:

- a. have raised a grievance, request or complaint;
- b. have raised a contractual query;
- c. are negotiating improved terms;
- d. have commenced or threatened legal proceedings (or similar); etc.

and a key Officer/Manager/Advisor/Consultant is temporarily out of the UK. Depending upon the circumstances this may be essential to the Group's business: meaning that it is a Legitimate Interest.

Any movement of Data abroad will be carried out with appropriate care.

Any Employee to whom your Data is transferred whilst they are abroad has received a copy of this Notice and knows their responsibilities and the likely disciplinary sanction for any Breach. Anyone else has either supplied details of their GDPR/DPA compliance to the Group or given an irrevocable Warranty that they will fully abide by the Group's Data Protection Policy, Data Security Policy, Privacy Notices and practices and that they accept responsibility for any Breach.

As far as is reasonably practical, such persons will limit communications to the Group Server (e.g. using Group e-mail addresses) and take particular care of receiving and storage devices: keeping them 'under lock and key' when not in use/on their person.

Sale/Sharing of Data

The Group will never sell Data relating to you or to other individuals or share it with third parties other than for a lawful purpose referred to above.

Your Rights



You should report any complaint/concern to the Group Chair without delay. Employees should do this using the Group Grievance Procedure. If the Group Chair is currently unavailable you should also report the matter to a senior manager. You have the right to make a complaint to the data protection authorities at any time. In the UK this is the Information Commissioner's Office.

You have the right to make a Data Subject Access Request ('SAR') at any time. The Group will respond within one month of the SAR. You will receive details/copies of all Data relating to you which is held by the Group and/or detailed written reasons why the Group is exercising its right under GDPR/DPA either to decline part or all of the request or to require payment where some or all of the request is manifestly excessive: in which case you have the right to make a complaint to the Information Commissioner's Office or seek a remedy through the Courts.

You have the right to request erasure of any or all such Data at any time. Within one month the Group will either confirm that the Data has been erased or inform you that the Group is exercising its right under GDPR/DPA to refuse to erase it, stating the reason (in which case you will have the right to make a complaint to the Information Commissioner's Office or seek a remedy through the Courts).

You have the right to request rectification of any inaccuracy in your Data which is held by the Group. Within one month the Company will confirm that the alleged inaccuracy has been amended as requested or inform you where the Group does not agree that it is inaccurate (in which case you will have the right to make a complaint to the Information Commissioner's Office or seek a remedy through the Courts).

You have the right to object to some or all processing of your Data by the Group. Within one month the Group will either confirm that your objection has been accepted and cease the processing or inform you that the Group is exercising its right under GDPR/DPA to refuse your objection, clearly stating the grounds for refusal (in which case you will have the right to make a complaint to the Information Commissioner's Office or seek a remedy through the Courts).

- You have the right to request Data Portability; but only in circumstances where the Group's Lawful Basis for processing the Data is consent or for the performance of a contract; and where the processing is carried out by automated means (i.e. excluding paper files); and where the Data is Personal Data supplied by you to the Group. The Group will respond within one month, and the Data will be sent to you or to the new designated controller or you will receive detailed written reasons why the Group is exercising its right under GDPR/DPA either to decline the request or to require payment (in which case you will have the right to make a complaint to the Information Commissioner's Office or seek a remedy through the Courts).



Your Obligations

It is a condition of any contract (of employment, service, or otherwise) which you may have with a Group company that you report any Data Breach to the Group Chair within one business hour of discovery of the Breach.

Employees & Subcontractors are required/others are advised to familiarise themselves with the Group's Data Protection Policy and Data Security Policy; copies of which are available at the Group's Offices.

James Amos
CA Group Chair

10.05.24

First Revision: 01.03.22

Second Revision: 03.04.23