Data Protection Policy

In the course of your work you may come into contact with and use confidential personal information about people, such as names and addresses or even information about customers' circumstances, families, health and other private matters. This policy helps you ensure that you do not breach the Data Protection Act 1998, which provides strict rules in this area. If you are in any doubt about what you may or may not do, seek advice from your line manager. If you are in doubt and cannot get in touch with him/her or our Chief Information Officer, do not disclose the information concerned.

The Company holds personal data about you. In your employment contract you have consented to the data being used as set out in the contract. If this information changes, you should let us know so that our records can be updated.

The Data Protection Act 1998 requires that eight data protection principles be followed in the handling of personal data. These are that personal data must:

- be fairly and lawfully processed;
- be processed for limited purposes and not in any manner incompatible with those purposes;
- be adequate, relevant and not excessive;
- be accurate;
- not be kept for longer than is necessary;
- be processed in accordance with individuals' rights;
- be secure; and
- not be transferred to countries without adequate protection.

The following personal data about you will be kept by us:

- Full Name
- Address
- Contact Telephone numbers
- Date of Birth
- National Insurance Number
- Bank Account Details
- Employment history
- References
- Next of Kin
- Payroll information
- Tax Codings
- Educational and Training Qualifications
- Staff Appraisal
- Copies of Identification as supplied by yourself

We obtain it from:

- Your Application Form
- Inland Revenue
- Referees supplied by yourself
- Staff Appraisal Interviews

It will be disclosed only to:

- Authorized Government Agencies
- Yourself
- A third party with your written consent

We hold sickness records about you. You give explicit consent to our holding sickness information about you. We state below how it will be used.

- For internal monitoring purposes
- To calculate Statutory Sick Pay

Where we give you code words or passwords to be used before releasing personal data, for example by telephone, you must ensure that you follow our requirements strictly. You may not give information about a family member to someone else from the same family.

If you access another employee's records or supply information to a third party without authority, this will be treated as gross misconduct and is a criminal offence under s.55 of the Data Protection Act 1998.

Do not transmit documents by email or fax unless specifically requested by the HR or Payroll Manager.

All documents containing personal information are to be forwarded to Head Office for safe keeping. No personal information is to be retained on site, other than that required for Health and Safety purposes i.e. Medical Questionnaire, next of kin, copies of competency cards. In these cases the files should be stored in a locked draw.

If the Company sells all or part of its business it may provide personal data about you to any prospective purchaser in the course of negotiations. So far as possible such data will be provided in an anonymous form and if this is not possible the prospective purchaser will be required to keep the information confidential. We will transfer your personal data on any transfer or sale falling within the terms of the Transfer of Undertakings (Protection of Employment) Regulations 1981.

We monitor e-mails but strictly in accordance with what is permitted under the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000. You have consented to this by a term in your employment contract.

Retention of records. The Company follows the retention periods recommended by the Information Commissioner in its Employment Practices Data Protection Code.

You should therefore treat the following as guidelines for retention times in the absence of a specific business case supporting a longer period.

Application form	Duration of employment
References received	1 year
Payroll and tax information	6 years
Sickness records	3 years
Annual leave records	2 years
Unpaid leave/special leave records	3 years

Annual appraisal/assessment records	5 years
Records relating to promotion, transfer, training, disciplinary matters	1 year from end of employment
References given/information to enable references to be provided	5 years from reference/end of employment
Summary of record of service, eg name, position held, dates of employment	10 years from end of employment
Records relating to accident or injury at work	12 years

Any data protection queries should be addressed to your line manager or our Chief Information Officer.

Signed by employee

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I hereby consent to the terms of this document.

Martin Cragg
Safety & sustainability Director
MPB Structures Limited
30th June 2026