

KDD Construction LTD is committed to protecting the privacy and security of personal data. This Privacy Policy outlines how we collect, use, store, and share personal information in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We process personal data in the course of managing construction projects as a principal contractor, including data from employees, subcontractors, site visitors, suppliers, and clients.

## 1. What Data We Collect

Depending on the nature of your relationship with us, we may collect and process the following data:

- Contact details: names, phone numbers, email addresses, emergency contacts
- Employment or trade information: job role, qualifications, CSCS cards, right to work documents, CVs
- Financial details: bank details for payroll or payments
- Identification: copies of photo ID, proof of right to work
- Health & safety data: incident reports, occupational health info (where applicable)
- Site-specific data: vehicle registration, access logs, CCTV footage

Digital usage data: IP address, email correspondence, form submissions via our website

## 2. How We Collect Data

We may collect personal data through:

- Direct interaction (employment, site access, email, phone, forms)
- Subcontractor onboarding and vetting processes
- Site sign-in systems, visitor logs, and security measures
- Health & safety reporting and compliance checks
- Website usage and online enquiry forms
- External references and verification services

## 3. Why We Process Personal Data

We process personal data for a variety of reasons related to construction project delivery, including:

- Contractual obligations - managing employees, subcontractors, and suppliers
- Compliance - fulfilling legal duties under CDM Regulations, employment law, health & safety law
- Security - controlling access to construction sites, protecting personnel and assets
- Insurance and incident management - recording accidents and managing claims
- Business administration - issuing payments, maintaining project records
- Marketing and business development (where appropriate and with consent)



# Privacy Policy

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## 4. Lawful Basis for Processing

We rely on the following lawful bases:

- Performance of a contract
- Legal obligations
- Legitimate interests (e.g., managing site access and safety)
- Consent, where required (e.g., marketing emails)
- Vital interests, in emergency or safety-critical situations

## 5. Sharing Personal Data

We may share data with third parties, including:

- Subcontractors and consultants involved in specific projects
- Health & safety advisors and training providers
- Payroll, pension, and HR service providers
- IT and cloud service providers
- Clients or principal designers (where required by contract)
- Insurers and legal advisors
- Regulatory bodies such as HSE or HMRC
- All third parties are required to process data in accordance with data protection law.

## 6. Data Storage and Security

We store data securely using:

- Encrypted digital systems
- Password protection and access controls
- Secure storage of physical files (if used)
- Staff training on data handling and confidentiality

## 7. Data Retention

We only keep personal data for as long as necessary. Typical retention periods include:

- Employee and subcontractor records: 6 years after project or contract end
- Health & safety records: 40 years (where required by law)
- Financial records: minimum of 6 years
- CCTV footage: up to 30 days (unless required for investigation)

## 8. Your Data Protection Rights

Under data protection law, individuals have the right to:

- Be informed about how we use their data
- Access personal data we hold
- Request correction or deletion of inaccurate data
- Restrict or object to certain processing
- Request data portability (where applicable)
- Complain to the ICO if they believe their data has been mishandled
- To make a request, contact: [Rumen@kddconstructionltd.co.uk](mailto:Rumen@kddconstructionltd.co.uk)

Signed:



Rumen Kehayov – March 2025

**Managing Director**