

DATA PROTECTION POLICY

Brenmar is committed to protecting the privacy and security of personal data. This policy outlines our commitment to data protection, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy applies to all personal data processed by Brenmar, including data relating to our employees, clients, contractors, suppliers, and any other individuals with whom we interact.

Scope

This policy covers all aspects of our data processing activities, including but not limited to:

- **Client Data:** Information collected from clients and prospective clients for project quotations, contracts, and project management.
- **Employee Data:** Information relating to our employees, including for HR, payroll, Health and Safety and performance management purposes.
- **Subcontractor and Supplier Data:** Information needed for procurement, contract management, Health and Safety Management and financial transactions.
- **Marketing Data:** Information used for marketing and business development activities.
- **Visitor Data:** Information collected from visitors to our premises or active sites.

Key Principles

We adhere to the following seven key principles of data protection as outlined by the UK GDPR:

- **Lawfulness, fairness, and transparency:** We process data lawfully, fairly, and in a transparent manner.
- **Purpose limitation:** We collect data for specific, explicit, and legitimate purposes and do not process it in a way that is incompatible with those purposes.
- **Data minimisation:** We collect only the data that is necessary for the specified purpose.
- **Accuracy:** We take reasonable steps to ensure that data is accurate and, where necessary, kept up to date.
- **Storage limitation:** We do not keep personal data for longer than is necessary for the purposes for which it was collected.
- **Integrity and confidentiality (security):** We have appropriate security measures in place to protect data from unauthorised access, accidental loss, damage, or destruction.
- **Accountability:** We are responsible for, and must be able to demonstrate compliance with, the above principles.

Roles and Responsibilities

- **Data Controller:** Brenmar is the Data Controller. Our registered address is Unit 7 Waltham Business Park, Brickyard Road, Swanmore, Southampton SO32 2SA. We are registered with the Information Commissioner's Office (ICO) under registration number ZB468581.
- **Data Protection Officer (DPO):** The Operations & Compliance Manager is responsible for overseeing our data protection strategy and implementation. They can be contacted at admin@brenmar.co.uk. All employees are responsible for adhering to this policy and protecting the personal data they handle.
- **All Employees:** Every employee is responsible for ensuring they understand and comply with this policy in their day-to-day work.

How we collect and use personal data

We collect personal data through various means, including:

- **Directly from Individuals:** When they contact us via email, telephone, or in person (e.g., providing details for a quote).
- **From Third Parties:** Such as from clients who provide stakeholders and interested parties' details.
- **Publicly Available Sources:** Such as Companies House or professional networking sites.

We use this data for the following purposes:

- **Project Management:** To manage and deliver projects, including client communication, contract administration, procurement and project delivery.
- **Human Resources:** To manage our workforce, including recruitment, payroll, performance management, and training.
- **Financial and Administrative:** For invoicing, payments, accounting, and compliance with legal and regulatory obligations.
- **Marketing:** To promote our services to new and existing clients (where consent is given or a legitimate interest applies).

Data Retention

We will not retain personal data for longer than is necessary. Our data retention schedule is as follows:

- **Client Project Data:** Retained for 60years after project completion to meet legal and contractual obligations.
- **Employee Records:** Retained for 60years after the employee leaves to comply with HMRC and other employment and Health and Safety law requirements.
- **Marketing Data:** Retained for as long as the data subject is an active business contact or until they unsubscribe.

Data Security

We have implemented a range of security measures to protect personal data, including:

- **Physical Security:** Secure storage of hard copy documents in locked cabinets.

- **Technical Security:** Password protection, firewalls, and anti-virus software on all company devices.
- **Organisational Security:** Employee training and restricted access to data.

We will notify the ICO and affected data subjects of any data breaches as required by the UK GDPR.

Individual Rights

Under UK GDPR, individuals have the following rights regarding their personal data:

- **Right to be Informed:** The right to know how their data is being processed.
- **Right of Access:** The right to request a copy of the personal data we hold about them.
- **Right to Rectification:** The right to have inaccurate data corrected.
- **Right to Erasure (Right to be Forgotten):** The right to have their data deleted in certain circumstances.
- **Right to Restrict Processing:** The right to limit the way we use their data.
- **Right to Data Portability:** The right to receive their data in a structured, commonly used format.
- **Right to Object:** The right to object to the processing of their data in certain circumstances.

To exercise any of these rights, individuals should contact the DPO at admin@brenmar.co.uk.

Third Party Data Sharing

We may share personal data with trusted third parties for business purposes, such as:

- **Clients, Subcontractors and Suppliers:** To facilitate project delivery.
- **Accountants and Legal Advisors:** For professional services.
- **IT Service Providers:** For data storage and security.

All third parties are vetted to ensure they have adequate data protection measures in place and are bound by confidentiality and data processing agreements. We do not transfer personal data outside the UK or European Economic Area (EEA) without appropriate safeguards.

Signed



Mark Harvey

Director

August 2025