

Data Protection Policy & Privacy Notice

Document owner: Managing Director, Danpol Ltd.

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Applies to: All Danpol entities, employees, applicants, suppliers, and clients whose personal data we process.

1. Purpose

This combined policy and privacy notice explains how Danpol Ltd. complies with UK GDPR, Data Protection Act 2018, and Constructionline CAS data governance requirements. It sets principles for collecting, using, storing, and sharing personal information.

2. Lawful bases & processing principles

- Personal data is processed lawfully, fairly, and transparently.
- We collect only what is necessary for specified purposes, keep it accurate and up to date, and retain it for no longer than needed.
- Lawful bases include contract performance (e.g., payroll, supplier management), legal obligations (e.g., HS&E reporting), legitimate interests (e.g., tender submissions), consent (e.g., marketing updates), and vital interests (e.g., emergency contacts).
- Special category data (health, diversity metrics) is protected with additional safeguards and access controls.

3. Data subject rights

Individuals can exercise rights to access, rectification, erasure, restriction, portability, objection, and automated decision-making safeguards. Requests should be sent to privacy@danpol.co.uk. We acknowledge within five working days and respond within one month unless complexity warrants an extension.

4. Categories of data held

- **Employees & workers:** identification, contact, payroll, pension, training, competency, health surveillance, access records.
- **Applicants:** CVs, interview notes, vetting outcomes.
- **Clients & suppliers:** contact data, contract details, financial information for payment and compliance checks.
- **Site visitors & community members:** visitor logs, CCTV footage, consultation responses.
- **Digital telemetry:** device IDs, login history, collaborative platform metadata.

5. Sharing & international transfers

Data may be shared with payroll providers, Smart Pension, insurers, medical specialists, travel partners, and vetted subcontractors when necessary. International transfers follow adequacy decisions, IDTA/Addendum clauses, or binding corporate rules. Suppliers must sign data processing agreements and complete security assessments.

6. Security controls

Danpol operates an ISO 27001/27701 ISMS covering encryption, MFA, role-based access, DLP, secure destruction, and breach detection. Paper records are stored in locked cabinets with access logs; disposal uses certified shredding. Data breaches are logged, contained, and reported to the ICO and affected individuals within statutory timelines where required.

7. Retention schedule

- HR and payroll records: six years after employment ends (longer where asbestos/CDM records dictate).
- Training and competence records: five years minimum or per client contract.
- CCTV: 30 days unless needed for investigations.
- Tender and contract documentation containing personal data: retained per contract plus six years.
- Marketing consents: reviewed annually and removed if consent withdrawn.

8. Privacy notice for employees & stakeholders

We use personal data to administer employment, pay, pensions, training, security vetting, wellbeing services, and performance management. Contact information may be used for emergency alerts and stakeholder engagement. We will not sell personal data, and any automated decision processes (e.g., rota optimisation) carry human oversight.

9. Contact details

Data Protection Officer (DPO) services are provided by the Mobilisation Governance Team. Queries or complaints may be sent to privacy@danpol.co.uk or Danpol Ltd., 124 City Road, London EC1V 2NX. Individuals also have the right to lodge complaints with the Information Commissioner's Office.

10. Review cadence

This policy and notice are reviewed every 12 months or sooner if regulation, ICO guidance, or client requirements change. Version control, approvals, and communication logs are stored in the policy vault to evidence compliance.

Signed on behalf of Danpol Ltd.:

A handwritten signature in black ink, appearing to be 'D. Nowakowski', with a long horizontal stroke extending to the right.

Daniel Nowakowski

Managing Director

1 December 2025

Digitally signed with authorisation stored in the Danpol policy vault.

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