

# SUPPLY CHAIN PRIVACY NOTICE

Willmott Dixon Holdings Limited and its subsidiary companies (“We” and “Us”) are committed to protecting and respecting privacy.

## WHAT IS A PRIVACY POLICY?

This Supply Chain Privacy Policy is about how we use personal information relating to the employees and workers of our supply chain partners working on our behalf or on our sites. We operate a separate Privacy Policy in relation to the way that we use information about our employees.

We are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you and to make you aware of how and why your personal data will be used for the purposes of the recruitment exercise, and how long it will usually be retained for.

## THE INFORMATION WE HOLD ABOUT OUR SUPPLY CHAIN

We will collect, store, and use the following categories of personal information about you:

- Personal details, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications;
- Site induction and training history;
- Professional/ Occupational Qualifications;
- Next of kin details and emergency contact information;
- Disciplinary cards; and
- Information about your right to work in the United Kingdom.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness record;
- Drug and alcohol results data, if appropriate; and
- Information about criminal convictions and offences (if relevant to the contract you are working on).

## HOW IS YOUR INFORMATION IS COLLECTED?

We collect personal information about our supply chain from the following sources:

- You;
- Your employer;
- The Disclosure and Barring Service, if appropriate; and
- Third party drug and alcohol testing services, if appropriate.

## DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **HOW WE WILL USE INFORMATION ABOUT A CANDIDATE**

We will use the personal information we collect about you:

- to ensure that you have the right skills, training and qualifications to comply with relevant regulatory requirements and standards for the works;
- health and safety monitoring of performance
- safeguarding purposes and to achieve the aims of our Modern Slavery Policy;
- to verify that you have the legal right to work on our sites or provide services on our behalf

We are allowed to process this information about you because it is in our legitimate interests to protect the health, safety and vital interests of you and others. We also need to process your personal information to ensure the efficient operation of our sites and services.

### **IF YOU DO NOT PROVIDE INFORMATION**

If you do not provide information when requested, it may be necessary for us to exclude you from site and to inform your employer.

### **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

We will use your particularly sensitive personal information in the following ways:

- Medical Issues that we should be aware of which may affect the safety of you or others, or which may affect how we respond to an emergency;
- Whether you present a risk due to an impairment through drugs or alcohol;
- We may also be required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular if:
  - we are legally required by a regulatory body to carry out criminal record checks in connection with a contract or service that you are working on;
  - the role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) and is also specified in the Police Act 1997 (Criminal Records) Regulations (SI 2002/233) so is eligible for a standard or enhanced check from the Disclosure and Barring Service;
- For safeguarding purposes and to achieve the aims of our Modern Slavery Policy; and
- To verify that you have the legal right to work on our sites or provide services on our behalf.

### **AUTOMATED DECISION-MAKING**

You will not be subject to decisions based on automated decision-making.

### **DATA SHARING**

*Why might you share my personal information with third parties?*

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We will only share your personal information with the following third parties for the purposes of processing your application:

- Where required because of a legal obligation (i.e. the Health & Safety Executive)
- Your employer;
- A third party service providers (e.g. software hosting providers);
- Associated Companies.

All our third-party service providers and Associated Companies are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

“Associated Companies” refers to those companies belonging to the same family of companies as us and who benefit from a close relationship, shared systems and shared ownership.

### **DATA RETENTION**

We will retain your personal information in accordance with our Data and Document Retention Policy and in accordance with the requirements of health and safety legislation.

### **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing, whose details are provided below.

### **RIGHT TO WITHDRAW CONSENT**

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If you have consented to us holding your details you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data, subject to our retention policy, we will dispose of your personal data securely and you will no longer be able to access our sites or services.

**ADDITIONAL INFORMATION**

If you talk to us over the Internet (for example by email or webmail) remember that this form of communication is not always secure. These kinds of messages may go through a number of countries before they are delivered. That is just the nature of the Internet, so we cannot accept responsibility for any unauthorised access or loss of personal information if it is beyond our control. We may use 'cookies' to monitor how people use our site. A cookie is a piece of information stored on your computer's hard drive that records how you have used a website. Our [cookies policy](#) tells you more about cookies and how we use them.

**DATA PROTECTION OFFICER**

If you have any questions about this Supply Chain Privacy Notice or how we handle your personal information, please contact the Data Protection Officer whose details are as follows:

Data Protection Officer  
Willmott Dixon Holdings Limited  
Spirella 2  
Icknield Way  
Letchworth Garden City  
Herts  
SG6 4GY

Or email [data.protection@willmottdixon.co.uk](mailto:data.protection@willmottdixon.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please consider contacting us in first instance.

Any changes we make to this Supply Chain Privacy Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see if there have been any updates or changes to our privacy policy.

This policy was last updated on 1<sup>st</sup> May 2018.

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