

Our **GDRP** Policy

APPLICATION

1. This private policy, (the 'Policy'), concerning personal data that we use in our course of running our business is regulated by the General Data Protection Regulation (GDRP) which applies across the European Union, including the United Kingdom.
2. This Policy is relevant and applies equally to all persons who have dealings with the SIA//Duvacourt Group. The SIA/Duvacourt Group includes Duvacourt Limited (also trading as Duvacourt Construction and as GIA Design), Bestcourt Properties Limited and its member Companies/Businesses in the Group on the one hand and all individuals who have dealings with the SIA/Duvacourt Group on the other hand.

MEANINGS

3. **Personal Data** means any information relating to an identified or identifiable individual.
4. **You** means any individual, (i.e. any person), who has dealings with the SIA/Duvacourt Group. The term includes customers, suppliers, employees, tenants and, generally, every person whom we are dealing with.
5. **Us/we** means any member Company/Business of the SIA/Duvacourt Group.

PERSONAL DATA THAT WE COLLECT

6. We collect personal data for the competent and safe performance of our work, our contract and for our duties and obligations to you and with the State.
7. Such information may include, (depending on our specific relationship with you);
 - a. Your name, address, telephone and mobile numbers, email address, information to enable us to check and verify your identity, e.g. your passport, driving licence, date of birth, bank account, etc.,
 - b. Details of our dealings with you such as the job we have been instructed to do for example. Such information may include records and details about the actual job we are doing or we are about to do, (past and present), as well as details of the property or properties related to the job or to matters relevant to our relationship with you overall.
 - c. Personal, employment and health records for our employees.

- d. Any other personal records required to perform our duties, obligations and agreements competently, efficiently, satisfactorily, safely and effectively.
8. We normally collect this information directly from you but from time to time we may also collect information:
- a. from publicly accessible sources,
 - b. third parties with your consent,
 - c. other records and logs.

USE

9. We use the information we have collected for a legitimate interest only.
- a. A legitimate interest is when we have a business or a reason to use your information provided that this reason is not overridden by your own rights and/or interests.
10. More specifically we only use this information to enter with you into a contract and perform that contract with you and generally in order to perform our duties, obligations and agreements competently, efficiently, satisfactorily, safely and effectively and, also for the purpose of carrying out our legal obligations as they may arise.
11. Unless we have your consent or we are obliged by law we do not share your information with any third party whatsoever;

EXCEPT

- a. in the case that in order to perform our contract with you or our services to you we must provide sufficient or necessary information to another party that is required for the performance of our contract with or services to you.
- b. In this instance your consent to share the minimum necessary information is implied and the recipient of the information will be bound by the confidentiality obligations set out by the GDPR.

HOLDING OF PERSONAL INFORMATION

12. Your personal information is held in our offices and it is kept under key for as long as it is necessary to keep those records.
- a. Computer records are held in our own computer system which is held securely in our offices and they are not shared with others. We do not use web found storage systems such as the Cloud and the like for storing data.
 - b. Paper and the like records are also held securely in our offices.
13. The period of keeping records may vary according to your relationship with us but generally, unless required for legal reasons, information is kept only for as long as we

may continue to have some sort of commercial relationship with you or there is a legal reason for it.

YOUR RIGHTS

14. You have the following rights to exercise over the information we have:

- a. The right to correct any mistakes in your personal data
- b. The right to have your data deleted, (unless prevented by legal or commercial reasons)
- c. The right to restrict processing of your personal data, (unless overridden by a legal or commercial reason)
- d. The right to know what personal data we hold of you.
- e. The right to object your personal data being processed for any reason other than our legitimate interests.

(We only process data for our own legitimate reasons for no other purpose.)

15. You may exercise any of your rights by writing to us at our correspondence address below and set out or explain to us clearly your instructions or what you want us to do.

SECURITY

16. We take your privacy very seriously and we have appropriate security measures to prevent personal data from being accidentally lost, (other than destroyed or deleted), or used or accessed unlawfully.

17. Only those in need to access your data may do so and, again, access is limited to the need for it.

- a. Anyone who has access to your data is bound by the same confidentiality obligations set out in the GDPR.

ADDRESS FOR CORRESPONDENCE

You may contact us:

- c: Administration, The SIA/Duvacourt Group
46a Pevensey Road, Eastbourne, East Sussex BN21 3HP
- t: 01323 722131
- e: admin@duvacourt.co.uk

OTHER

We reserve the right to amend this Privacy Policy to meet changing circumstances and/or the law.

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© Duvacourt Limited, 2018
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