

Data Protection Policy

How we handle personal data, in line with UK GDPR and the Data Protection Act 2018

Policy owner	Darren Harris, Director
Company	Lawday Construction Limited
ICO registration	Registered — Tier 1
Version	2
Issue date	14/09/2026
Review date	14/09/2027

1. Policy statement

Lawday Construction Limited is committed to protecting the personal data of our employees, subcontractors, clients and other individuals we deal with, and to processing personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy sets out how personal data is collected, used, stored, shared and protected across the business.

Lawday Construction Limited is registered with the Information Commissioner's Office (ICO).

2. Scope and responsibilities

This policy applies to all personal data processed by Lawday Construction Limited, in any format, and to all directors, employees and subcontractors who handle personal data on behalf of the company.

The Director (Darren Harris)

- Holds overall responsibility for data protection compliance and acts as the company's primary contact for data protection matters.
- Ensures personal data is processed lawfully, fairly and transparently, and that this policy is reviewed at least annually.

Employees and subcontractors

- Handle personal data they encounter in the course of their work securely and only for its intended purpose.
- Report any suspected data breach or loss of data to the Director immediately.

3. What personal data we hold, and why

The table below summarises the main categories of personal data processed by the company, our purpose and lawful basis for holding it, and how long it is generally retained. Retention periods may vary where a longer period is required by law (for example, HMRC and pension record-keeping requirements).

Category	Data held	Purpose / lawful basis	Retention
Employees	Name, address, DOB, NI number, bank details, salary, pension details, sickness/absence records	Payroll, pension auto-enrolment and employment administration — contract, legal obligation	6 years after employment ends (HMRC requirement)
Subcontractors (CIS)	Name, UTR, company details, bank details, insurance details	CIS payment and compliance — legal obligation, contract	6 years (HMRC requirement)
Clients	Name, contact details, property address, project details	Delivering contracted work, quotations, invoicing — contract, legitimate interest	6 years after project completion (contract/liability period)

Job applicants	Name, contact details, CV/application details	Recruitment — legitimate interest, consent	6 months if unsuccessful, unless consent given to retain longer
Website / enquiry contacts	Name, email, phone, enquiry details	Responding to enquiries — legitimate interest, consent	Up to 2 years from last contact

4. How personal data is shared

Personal data is shared only where necessary, with the following categories of third party:

- HMRC and The People's Pension — for payroll, tax, CIS and pension auto-enrolment obligations.
- QuickBooks Online — our accounting and payroll software provider, acting as a data processor.
- Tide — our business banking provider.
- Capitalise and Creditsafe — for credit monitoring and financial due diligence.
- Insurers, professional advisors and regulatory or accreditation bodies, where required to deliver or evidence our work.

We do not sell personal data to third parties. Where a third-party provider processes data on our behalf, we take reasonable steps to ensure they apply appropriate security and data protection standards.

5. Data security, storage and location

Personal data is held using the following systems, and access is limited to those who need it to carry out their role:

- QuickBooks Online — payroll, CIS and accounting data.
- Tide — banking data.
- Zoho Mail — email and client/business correspondence.
- A cloud-synced drive — project files and working documents.

Lawday Construction Limited does not operate any locally hosted servers; all systems used are cloud-based, provided by reputable third parties, so no on-premises physical server security arrangements apply. Personal data is held within the UK and/or European Economic Area through our cloud service providers, and is not otherwise transferred outside the UK/EEA. Physical records, where held, are kept securely.

6. Data protection training

All employees who handle personal data as part of their role receive an induction briefing on this policy and our Privacy Notice when they join the company, covering how to handle personal data securely, what to do in the event of a suspected data breach, and who to contact with any data protection query.

This policy is reviewed with employees and subcontractors as part of our periodic policy briefings (see our Policy Briefing & Sign-Off Record), and refreshed at least annually or when this policy is materially updated, to ensure awareness remains current.

7. Individual rights

Individuals have the right to access personal data we hold about them, request corrections, request erasure (subject to legal retention requirements), object to certain processing, and request data portability, in accordance with UK GDPR. Requests should be made to the Director using the contact details in our Privacy Notice, and will be responded to within one month.

8. Data breaches

Any suspected personal data breach will be investigated by the Director without delay. Where a breach poses a risk to individuals' rights and freedoms, it will be reported to the ICO within 72 hours of the company becoming aware of it, and affected individuals will be informed where required.

9. Monitoring and review

This policy will be reviewed at least annually, and revised as necessary to reflect changes in legislation, ICO guidance, or the nature of data processed by the business. It will be brought to the attention of all employees and subcontractors.

Signed on behalf of Lawday Construction Limited



Signature:

Name: **Darren Harris**

Position: Director

Date: 14/09/2026