



**BRADAM**

# **Bradam – Data Protection Policy**

## **1. Purpose of this Policy**

Bradam ("the Company") is committed to protecting the privacy and security of personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy outlines how we collect, use, store, and manage personal data relating to our employees, clients, suppliers, and other individuals.

## **2. Scope**

This policy applies to:

- All employees, workers, contractors, and third-party service providers working with Bradam.
- All personal data processed by Bradam, whether held digitally or in hard copy.

## **3. Data Protection Principles**

Bradam will ensure that personal data is:

1. **Processed lawfully, fairly, and transparently**
2. **Collected for specified, explicit, and legitimate purposes**
3. **Adequate, relevant, and limited to what is necessary**
4. **Accurate and, where necessary, kept up to date**
5. **Kept for no longer than is necessary**
6. **Processed securely to prevent unauthorised access, loss, or damage**

## **4. Legal Bases for Processing Data**

We will only process personal data where there is a lawful basis under the UK GDPR, such as:

- Contractual obligation (e.g., employment or service contracts)
- Legal obligation (e.g., health and safety reporting)
- Legitimate interest (e.g., business operations)



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- Consent (where required, such as for marketing)

## 5. Personal Data We May Collect

Bradam may collect and process the following types of personal data:

- Names, addresses, and contact details
- National Insurance numbers and right-to-work documentation
- Employment records and training certifications
- Financial details (e.g., bank account for payroll)
- Health and safety information (e.g., accident records)
- Site access and CCTV recordings (for security purposes)

## 6. How We Use Personal Data

We use personal data to:

- Administer payroll, pensions, and employee benefits
- Manage recruitment, contracts, and performance
- Fulfil legal and regulatory obligations (e.g., HMRC)
- Ensure health, safety, and security on construction sites
- Communicate with clients and suppliers

## 7. Data Retention

Personal data is retained only as long as necessary for the purpose it was collected. Retention periods are defined in our internal data retention schedule and reviewed regularly.

## 8. Data Security

Bradam takes data security seriously and uses appropriate technical and organisational measures to:

- Restrict access to personal data
- Use secure storage and encrypted systems
- Train staff on data protection responsibilities
- Ensure secure disposal of records when no longer needed



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## 9. Data Sharing and Transfers

We may share personal data with:

- HMRC and other government bodies
- Payroll providers and professional advisers
- Insurers and health & safety consultants
- Clients and contractors, where necessary for project delivery

We do not transfer personal data outside the UK unless safeguards are in place to protect it.

## 10. Rights of Individuals

Under the UK GDPR, individuals have the right to:

- Access their personal data
- Request correction or deletion
- Object to or restrict processing
- Withdraw consent where applicable
- Lodge a complaint with the Information Commissioner's Office (ICO)

Requests to exercise these rights should be sent to **admin@bradam.co.uk**.

## 11. Responsibilities

- **Managing Director:** Has overall responsibility for ensuring compliance.
- **Employees:** Must follow this policy and report any data breaches or concerns.
- **Data Protection Contact:** [Insert name/position] is the first point of contact for data-related queries.

## 12. Data Breaches

Bradam has a procedure in place to detect, report, and investigate personal data breaches. Where required, breaches will be reported to the ICO within 72 hours.

## 13. Review and Updates



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This policy will be reviewed annually or when there are changes in legislation or company operations.

**Approved by:** Adam Bogard

**Position:** Director

**Date:** 22<sup>nd</sup> April 2025