

BACKGROUND:

Capstan Group Services Ltd understands that your privacy is important to you and that you care about how your personal data is used.

1. Information About Us

Capstan Group Services Ltd. Registered in England under company number 1000 1778.

Registered address: Unit 20 Capstan Centre – Thurrock Park Way – Tilbury Essex RM18 7HH.

VAT number: 249 386563. Sales@capstanservices.co.uk – 01375 842 769

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- b) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- c) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- d) The right to restrict (i.e. prevent) the processing of your personal data.
- e) The right to object to us using your personal data for a particular purpose or purposes.
- f) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- g) Rights relating to automated decision-making and profiling. We do not use your personal data in this.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us:

Name	Date of birth	Gender
Address	National insurance number	Email address
Telephone number	Business name (if applicable)	Job title
Payment information	Training records	Medical records

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- To prove you have the desire skill to complete the works.
- To prove you are fit to complete the works of a given contract.
- To book you in for training and medical testing.
- Communicating with you. This may include responding to emails or calls from you.
- For clients to be able to contact you if you are a contact for a project.
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing sales@capstanservices.co.uk).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Data Ref.	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
MC	Medicals	To record medicals of those working with Asbestos and HVAS	Every 2 years	40 years	It is a legal requirement to keep all medicals for a minimum of 40 years as can take this long for symptoms to show
TC	Training certificates	To show when refresher training is needed and to show they have the right skills for the works at hand	As and when certificate expires	Out of date certificates to be replaced after refresher training and maintain in personal file and on HR drive	Current training certificates to be keep until one year after the works have completed in case there is any come back from clients on works not completed to standard.
NSF	New starter Form	Employees contact details and next of kin details, proof of address	No review	6 years after employment has ended	This takes into account that there is the possibility that any documents relating to an employee could be relevant to a Tribunal, County Court or High Court claim, for up to six years after termination of employment
FF	Face fits	To demonstrate their equipment is to the needs of the individual	Every 2 years	Until end of employment	New certificate every 2 years full face and half face – old one can be destroyed
RPE	Respiration Check	To demonstrate RPE is in working order	Every 6 months	Until end of employment	New certificate every 6 months – old one can be destroyed
MH	Medical history form	To show employees previous history to ensure they are not over exposed to certain working conditions	No review	Maintain for 40 years minimum	Can take 40 years for illnesses to show
ID	Identification	Form of identification to prove employee is eligible to work in the UK	yearly	6 years after employment has ended	This takes into account that there is the possibility that any documents relating to an employee could be relevant to a Tribunal, County Court or High Court claim, for up to six years after termination of employment
DL	Driving license	If using company car, prove have a current valid license	Every 10 years when photo card expires	6 years after employment has ended	^^^
PM	Personal monitoring	Details of PM conducted on employees to show they have not been exposed to excess amounts of fibres	On-going process	Maintain for 40 years minimum	Can take 40 years for illnesses to show
SCSP	Sub-contractor starter pack	Details such as UTR, name, address, phone number, medical history, training certificates, to show they are	Resubmit each year if still working as	5 years after the period they last work for the company	Maintained for 5 years for tax purpose

		the correct skills and fit to complete the works being employed for	need updated policies and insurances		
SC	Security Clearance	Copies of security clearance to show employee / sub-contractors eligible to work on certain sites	3 years	6 years after employment has ended	This takes into account that there is the possibility that any documents relating to an employee could be relevant to a Tribunal, County Court or High Court claim, for up to six years after termination of employment
CV	CV's	For using in tenders submissions to show clients our team have the skills to complete the works	Updated yearly to ensure data accurate	End of employment	
PR	Payroll data	Used to show what we have paid including PAYE and NI payments, including bank details to make payments	No review	6 years after employment has ended	This takes into account that there is the possibility that any documents relating to an employee could be relevant to a Tribunal, County Court or High Court claim, for up to six years after termination of employment
PD	Pension data	Used to show how much has been paid into pension account	No review	6 years after employment has ended	This takes into account that there is the possibility that any documents relating to an employee could be relevant to a Tribunal, County Court or High Court claim, for up to six years after termination of employment
AD	Analysis details	Details of analysis who conducted surveys, for the removal of asbestos	Start of each new job pack	Maintain for 40 years minimum	All jobs packs need to be obtained for 40 years, as can take 40 years for illnesses to show
CC	Client contact details	Emails, phone numbers and work addresses of clients we communicate with on projects and billing	Start of each new works	5 years after the period they last work for the company	Maintained for 5 years for tax purpose
SC	Supplier contact details	Emails, phone numbers and work addresses of suppliers we communicate with on orders and billing, including bank details to make payments	No review	5 years after the period they last work for the company	Maintained for 5 years for tax purpose
EMP	Employee Mobile phones	To contact staff	No review	End of employment	
EEM	Emails of staff members	To send pay slips and communicate with them on where they are working	Update if their change	End of employment	
CT	Contract of employment	To show working rights and entitlements	If terms change	6 years after employment has ended	This takes into account that there is the possibility that any documents relating to an employee could be relevant to a Tribunal, County Court or High Court claim, for up to six years after termination of employment
PR	Performance reviews	To show conversation held with employees on performance, includes TBT, TNAs,		6 years after employment has ended	This takes into account that there is the possibility that any documents relating to an employee could be relevant to a Tribunal, County Court or High Court claim, for up to six years after termination of employment
DP	Disciplinary	Details of any disciplinarians on employees		Until expires (6 months – year)	
SA	Site audits	Details of how sites & staff are performing, both internal and external		3 years	We need to keep our audits to show the HSE we have been conducting inspections during the period of our licence
POW	POW paperwork	Show certain elements were completed, such as signing in, RPE checks, reading the POWs,		40 years	All jobs packs need to be obtained for 40 years, as can take 40 years for illnesses to show
AR	Accidents reports	Details of accidents including personal injury and car accidents		3 years	Civil claims for injury can be made up to 3 years after an incident, so it is a good idea to also keep risk assessments relating to the previous 3 years .

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

9. Do You Share My Personal Data?

We may share your personal data with other companies in **that we work for to prove you are fit and qualified to complete the works we are being commissioned to carry out**

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 4 weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of training manager:

Email address: sales@capstanservices.co.uk

Telephone number: 01375 842 769

Postal Address: Unit 20 Capstan Centre – Thurrock Park Way – Tilbury Essex RM18 7HH.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.



Signed: Robert Beach

Managing Director

Capstan Group Services