

DOCUMENT POLICY 22

CUSTOMER & SUPPLIER DATA PROTECTION POLICY GDPR



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A) INTRODUCTION

We may have to collect and use information about customers and suppliers with whom we work. This information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of data information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat this information lawfully and correctly.

To this end we fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR).

This policy applies to the processing of customer and supplier data in manual and electronic records kept by us in connection with our Company operations function. It also covers our response to any data breach and other rights under the GDPR.

This policy applies to the data of individual clients of BdR and former clients of BdR, services providers and self-employed contractors. These are referred to in this policy as relevant individuals.

B) DEFINITIONS

"Data" is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, online identifier. It can also include pseudonymised data.

"Data processing" is any operation or set of operations which is performed on client data or on sets of client data, supplier data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

C) DATA PROTECTION PRINCIPLES

Under GDPR, all data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay



BdR (Civil and Structural Engineering) Limited
Registered in England & Wales No: 04193189
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- e) data is not kept for longer than is necessary for its given purpose
- f) data will be processed in a manner that ensures appropriate security of client data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we will comply with the relevant GDPR procedures for international transferring of client data

D) TYPES OF DATA HELD

We keep several categories of data on our customers and suppliers in order to carry out effective and efficient processes. We keep this data within our computer systems, for example, CRM data base and Sage Accounts system

Specifically, we hold the following types of data:

- a) client details such as name, address, phone numbers, email addresses and correspondence

All of the above information is required for our processing activities. More information on those processing activities are included in our privacy notice for customers and suppliers, which is available from our website.

E) INDIVIDUAL RIGHTS

You have the following rights in relation to the client data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;

F) RESPONSIBILITIES

In order to protect the data of relevant individuals, those within our business who must process data as part of their role have been made aware of our policies on data protection.

G) LAWFUL BASES OF PROCESSING

We acknowledge that processing may be only be carried out where a lawful basis for that processing exists and we have assigned a lawful basis against each processing activity.

Where no other lawful basis applies, we may seek to rely on the customer/supplier consent in order to process data.

However, we recognise the high standard attached to its use. We understand that consent must be freely given, specific, informed and unambiguous. Where consent is to be sought, we will do so on a specific and individual basis where appropriate. Customers and Suppliers will be given clear instructions on the desired processing activity, informed of the consequences of their consent and of their clear right to withdraw consent at any time.

H) ACCESS TO DATA

As stated above, our customers and suppliers have a right to access the client data that we hold on them. To exercise this right, they should make a Subject Access Request. We will comply with the request without delay, and within one month unless, in accordance with legislation, we decide that an extension is required. Those who make a request will be kept fully informed of any decision to extend the time limit.

No charge will be made for complying with a request unless the request is manifestly unfounded, excessive or repetitive, or unless a request is made for duplicate copies to be provided to parties other than the employee making the request. In these circumstances, a reasonable charge will be applied.

Further information on making a subject access request can be made by telephoning our office on 01732 851416.

I) DATA DISCLOSURES

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

These kinds of disclosures will only be made when strictly necessary for the purpose.

J) DATA SECURITY

Where data is computerised, it will be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

K) THIRD PARTY PROCESSING

Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

L) INTERNATIONAL DATA TRANSFERS

The Company does not transfer data to any recipients outside of the EEA.

M) REQUIREMENT TO NOTIFY BREACHES

All data breaches will be recorded on our Data Breach Register. Where legally required, we will report a breach to the Information Commissioner within 72 hours of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach.

N) TRAINING

New employees who will have access to Company data must read and understand the policies on data protection as part of their induction.

All employees receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

The nominated data compliance officers for the Company are trained appropriately in their roles under the GDPR.

All employees who need to use the computer system are trained to protect individuals' private data, to ensure data security, and to understand the consequences to them as individuals and the Company of any potential lapses and breaches of the Company's policies and procedures.

O) RECORDS

The Company keeps records of its processing activities including the purpose for the processing and retention periods in its Data Record. These records will be kept up to date so that they reflect current processing activities.

P) DATA PROTECTION COMPLIANCE

Our appointed compliance officers in respect of our data protection activities are:

Deirdre Dugay

deirdre@bdr.uk.com

Date of Review: 08-07-2025

Next Review : 08-07-2026

Signed

A handwritten signature in black ink, appearing to read 'Shaun Best', with a stylized flourish at the end.

Shaun Best
Managing Director