

Willmott Dixon

Contractor and Third-Party Privacy Notice (including the use of CCTV)

Introduction

Willmott Dixon is committed to maintaining the privacy of our contractors and others (who are not employees) who may visit our sites or offices or use our systems. We comply with data protection laws that are applicable in respect of data processing within the UK. Willmott Dixon is the data controller of this information.

This privacy notice sets out how we collect, use and protect your personal data and also informs you of your rights in relation to that data.

What type of data do we collect?

So that we can effectively maintain and administer your interaction with us (whether as a contractor working on our sites or other places where we provide products or services), manage our business and meet our obligations to you, it may be necessary for us to collect and process personal data about you. The categories of personal data that we may collect include:

- personal details (for example, your name, date of birth)
- your bank details and national insurance number
- documents evidencing your entitlement to work in the UK
- your contact details (for example, your address, phone number and e-mail address)
- your competence to carry out roles (for example, your skills and experience)
- our views about you (for example, your performance)
- performance details
- your job title, job role and remuneration
- details relating to your working patterns
- medical information about you
- information about your internet usage through the Willmott Dixon network
- your location (for example, your IP address)
- details about your driving behaviour
- information relating to access to Willmott Dixon facilities (for example, login details or details of site entry)
- your trade union membership
- security clearance and vetting details
- details relating to your absence (for example, holiday leave)
- details of any disciplinary or grievance procedures in which you may have been involved
- details of others you have named, such as your emergency contacts
- information about any whistleblowing concerning you
- audio and visual images / photographs (including footage from CCTV and call recordings)
- biometric data including fingerprint and facial scans
- criminal records information (for certain roles/circumstances only)
- equal opportunities monitoring information (such as your ethnicity and religious beliefs)
- employment references about you
- moving imagery and/or audio which may be your personal data when you are visiting or attending a Willmott Dixon site or another location where Willmott Dixon operates.

Some data we hold about you may not have been provided directly by you: it may have come from one or more of the following sources:

- previous employers
- recruitment companies
- medical professionals
- health providers and administrators
- legal or government bodies/agencies (e.g. HMRC)
- pension administrators
- your trade union
- providers of employee benefits
- educational/training institutions
- organisations involved in road and transport administration
- insurance companies and companies involved in insurance administration
- publicly available sources
- The Disclosure and Barring Service
- joint venture partners working with Willmott Dixon or other companies that Willmott Dixon has a relationship with
- work colleagues, former employees and members of public.

Will personal data be processed about my family and/or other dependents?

If you have provided to Willmott Dixon personal data about your family and/or other dependents, we ask that you obtain their consent to the use (including transfer to third parties as explained below) of that personal data and, for any individuals not legally competent to give consent, you consent on their behalf (and confirm you have the authority to do so).

How will we use your data?

Your personal data will be processed to administer and facilitate your employment with us. It will be stored, processed and used by us to:

- operate our People/HR processes
- administer People/HR-related processes including those relating to business planning and restructuring
- ensure you are legally entitled to work in the UK
- administer any driver related processes to enable you to drive on Willmott Dixon business
- administer payment related processes
- operate and keep a record of disciplinary, complaint and grievance issues and to monitor conduct
- ensure you are competent and qualified to perform your role
- assess your fitness to work
- administer driver related processes to enable you to drive on Kier business
- locate and contact you to recover any debts/Willmott Dixon property
- identify and help to manage potential risks to your health or wellbeing that may arise from your connection with Willmott Dixon (including attendance at site) and to consider any reasonable adjustments for you to undertake your role
- help ensure safety and security at our sites
- send your data to third parties where appropriate (see details below)
- communicate with you for purposes necessary for your employment at Willmott Dixon
- organise events
- monitor use of Willmott Dixon facilities, including IT
- provide you with access to training and development services
- review and monitor the structure and organisation of our business and to make adjustments as appropriate

- measure your performance (for example, performance appraisals)
- contact your emergency contacts when necessary
- maintain and promote equality and diversity in our business
- better understand your employee needs and to improve and manage our business
- to monitor conduct of individuals on or around Willmott Dixon property or the sites where Willmott Dixon may provide products or services
- for the prevention of anti-social behaviour

Automated decision making

Willmott Dixon does not carry out solely automated decision making (where decisions are made without human intervention). Some of our physical sites have entry barriers. While the overall decision as to whether individuals are permitted on site is made by relevant people on site, the site entry management system assists us to implement that decision at the point of physical entry. You have the right to ask for alternative procedures and to challenge any decisions made.

Do we pass data to third parties?

We (or an agent working on our behalf) may pass your personal data to third parties for the purpose of your attendance on site or other requirements to manage our dealings with you or to assist us in using your data in one of the ways set out above.

The third parties that we may disclose your personal data to are usually either companies that provide services to us, where we need to provide information to operate our business efficiently, effectively and safely, or those whom we are required to provide your details to either by law or other obligation. These third parties may include:

- organisations that are involved in the administering of your (if appropriate) driving on Willmott Dixon business or for Willmott Dixon, such as the Driver and Vehicle Licensing Agency (DVLA) and our vehicle solutions provider
- companies that perform background, reference and security vetting (as appropriate) checks for us
- health professionals
- insurance brokers, insurance providers, loss adjusters and legal representatives
- our joint venture partners or other companies connection with the location at which you may be attending or have a connection with
- our clients and business partners, including companies that provide a service to us
- companies involved in the provision of our IT
- learning and training companies
- companies involved in debt recovery
- government agencies for apprenticeship schemes
- external consultants whom we engage to provide services to us
- internal and external auditors
- other organisations where we are required by law or where we are contractually required to pass your information (such as HMRC)
- companies whom you have requested that we provide references to
- government bodies, regulators, fraud agencies, law enforcement agencies, courts/tribunals and insurers.

Where we share your information, this will be strictly on a 'need to know' basis.

How is my data safeguarded?

Willmott Dixon takes the security of your data seriously. We have internal policies and controls in place to help ensure that your data is not mishandled or compromised. Access to the data is only provided to our staff who need access in the proper performance of their duties.

We have in place security measures which are designed to protect the security of your personal information and keep it confidential. We cannot guarantee the security of any third-party application you may use to transmit your data (for example, internet browsers).

We may transfer and process your data outside of the UK. Where your personal information is to be transferred outside the UK we will take reasonable steps to ensure that there are appropriate safeguards to protect your information and your rights in relation to it.

Where Willmott Dixon engages third parties to process personal data on our behalf, we typically do so on the basis of written instructions and under a duty of confidentiality and they are obliged to implement reasonable technical and organisational measures designed to ensure the security of personal data.

How long will we hold personal data?

We will keep your personal information for at least as long as we have a relationship with you or anyone whose personal information you have provided. When deciding how long to keep your personal information after our relationship with you has ended, we will keep your information for a period of time taking into account our legal, professional and regulatory obligations as well as any investigations that may arise. Each piece of personal data is held for a period of time which depends on the purpose that it was collected for. Your personal data will not be retained for longer than necessary.

On what grounds will you process my personal data?

Data protection laws require us to meet certain conditions before we can process your personal data. To use your personal information, we will rely on one or more of the following grounds:

- to meet our contractual obligations to you (such as paying your salary into your bank account)
- to meet our legal obligations (such as compliance with employment law or health and safety law)
- to meet our legitimate interests to manage our business and/or maintain your employment with us
- if you, or we, bring a legal claim (e.g. court action) against the other, we may use your information to either establish our position, or defend ourselves in relation to that legal claim
- to assess your working capacity and, in some cases, for the provision of health treatment
- to comply with obligations relating to employment, social security or social protection (e.g. processing relating to pensions administration)
- to promote and maintain equality of opportunity or treatment at Willmott Dixon
- to provide safeguards under employment law (in the case of biometric data on operational sites)
- processing where you have made your personal data available in the public domain
- processing for the prevention of an unlawful act or to prevent fraud
- where the processing is required for an insurance purpose
- where the processing is necessary for the purpose of determining the eligibility for, or benefits payable under, the Willmott Dixon occupational pension scheme
- otherwise, where we have your consent to process your personal data. Where this is the case, this will have been communicated to you at the point of collection.

CCTV

This notice also sets out how we maintain your privacy when Willmott Dixon captures CCTV images and/or audio in relation to its offices or sites or other sites where it operates. When we use CCTV, it is primarily for the protection of our colleagues, customers and business. This includes investigating accidents, incidents, potential criminal activities and potential breaches of our policies.

Occasionally we share CCTV with public or regulatory authorities, or in response to requests from companies or individuals, which are seeking to protect their rights or the rights of others, investigating incidents or potential crimes or potential breaches of policy or attempting to prevent crime. We will only share CCTV if we consider a request to be appropriate.

Your information/complaints

The personal data about you that we hold is available to you to view and amend. We encourage you to update any information about you if it is out of date or let us know of any changes.

You have rights regarding your personal information, including the right to access and correct your information and, in certain limited circumstances, restrict or object to our use of it, request erasure of your details or to port your personal data to another provider. You also have the right to object to our use of automated decision making and challenge any decisions made. We may need extra information from you to deal with any request.

If you feel you have cause for complaint, please contact us in the first instance and we will follow up with you to resolve this. If you believe that we have not resolved your complaint, you have the option to direct your complaint to the Information Commissioner's Office (ICO). Their contact information is available on their website at www.ico.org.uk.

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