

Data Controller: FM Conway Ltd, Conway House, Vestry Road, Sevenoaks, Kent TN14 5EL and group companies.

The company collects and processes personal data relating to individuals depending on the way in which the individual interacts with the company. The company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

HOW DOES FM CONWAY COLLECT INFORMATION?

The company may collect information in a variety of ways. For example, data may be collected through:

- Contracted works
- Subscribers to its publications
- Completion of enquiry forms
- Receipt of calls from members of the public to its Central Services
- Expression of interest in being considered for a role
- Requests for being considered for a charitable donation
- Entering a competition, promotion or survey
- Providing feedback
- CCTV systems at its locations and on cameras attached to its fleet of vehicles/plant
- Expression of interest in services

In some cases, the company may collect personal data about you from third parties, such as the DVLA and educational institutions that recommend candidates for employment.

Data will be stored in various places, including hard copy documents at one of its locations or in its IT systems (including the company's email system).

WHY DOES FM CONWAY PROCESS PERSONAL DATA?

The company needs to process data for various reasons, depending on the relationship with the individual. The company will only process your data for one of the following reasons:

- Contract performance
- Legal obligation
- Vital interest
- Legitimate interest
- Where you have given consent

If we rely on a legitimate interest, we will set out at the time what that legitimate interest is and why it applies.

Some special categories of personal data, such as information about health or medical conditions, may be processed, however this will only be done where there is a basis under the GDPR to do so.

WHO HAS ACCESS TO DATA?

Your information may be shared internally, including with members of the operational or support teams.

The company may share your data with third parties such as its clients, insurers, subcontractors, suppliers, legal advisors, regulatory bodies, service providers and joint venture companies.

Your data may be transferred to countries outside the European Economic Area (EEA) for example where processing is carried out by a third-party benefits provider outside of the EEA, and where that provider has guaranteed the safeguarding of personal data.

HOW DOES FM CONWAY PROTECT DATA?

The company takes the security of your data seriously. The company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its authorised users in performance of their duties. Where the company engages third parties to process personal data on its behalf, it does so on the basis of written instructions, it under a duty of confidentiality and is obliged to implement appropriate technical and organisational measures to ensure the security of data.

FOR HOW LONG DOES THE COMPANY HOLD DATA?

FM Conway ensures that it does not retain personal data for any longer than is necessary for legal or regulatory reasons or for its legitimate organisational purposes, and ensures timely and appropriate disposal at the end of the data's useful life through risk assured measures such as secure erasure or anonymisation.

Personal data are not kept for longer than necessary and are disposed of in a secure manner when they are no longer required. However, FM Conway is permitted to keep personal data (gathered from public contracts) for longer if it is only kept for public interest archiving, scientific or historical research, or statistical purposes (appropriate safeguards will be arranged to comply with this).

FM Conway will regularly review the data it holds, and delete or anonymise anything it no longer needs.

YOUR RIGHTS

As a data subject, you have a number of rights. You can:

- Request what information is held about you by the company and a copy thereof;
- Require the company to change incorrect or incomplete data
- Require the company to erase your personal information, subject to qualification under the GDPR;
- Require the company to delete or stop processing your data, for example were the data is no longer necessary for the purpose of processing; and
- Object to the processing of your data where the company is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact us by email at gdpr@fmconway.co.uk.

If you believe that the company has not complied with your data protection rights, you can complain to the Information Commissioner.