

## Data Protection Policy

### 1. Policy Statement

Thornwood Design & Build Ltd (“Thornwood”) is committed to protecting the privacy and security of personal data. We collect, process, and store data in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant laws.

We operate under the principle of privacy by design – embedding data protection into every part of our operations, from design to delivery. Whether working on residential refurbishments, new builds, education projects, or healthcare facilities, we uphold the highest standards of data integrity and security.

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### 2. Scope

This policy applies to:

- All Thornwood employees, subcontractors, consultants, and supply chain partners.
  - All personal data processed by Thornwood in relation to clients, suppliers, employees, site personnel, and other stakeholders.
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### 3. Our Approach: Design, Build & Deliver (with Privacy)

At Thornwood, we:

- **Design** our systems and workflows with data minimisation, access control, and transparency in mind.
  - **Build** secure and compliant procedures for data processing, both in our office and on-site.
  - **Deliver** high-quality projects while safeguarding the rights and freedoms of individuals whose data we hold.
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#### 4. Legal Basis for Processing

We process personal data based on one or more of the following:

- Performance of a contract (e.g. construction project agreements).
  - Legal obligation (e.g. tax or employment laws).
  - Legitimate interest (e.g. supplier management or tendering processes).
  - Consent (e.g. marketing communications, if applicable).
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#### 5. Data We Collect

We may collect and process:

- **Client and consultant details** – names, contact details, job titles, and project-specific information.
  - **Employee and subcontractor data** – payroll, emergency contacts, qualifications (e.g. CSCS, SMSTS), and health & safety records.
  - **Site and visitor information** – CCTV footage, site induction data, access logs.
  - **Marketing and communications data** – testimonials, email interactions, social media responses.
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#### 6. Data Security

We implement:

- Secure digital storage (password-protected servers, encrypted backups).
  - Restricted access (role-based permissions).
  - Physical security (lockable storage, controlled site access).
  - Cyber protection measures (firewalls, antivirus, device encryption).
  - Subcontractor data handling agreements.
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## 7. Data Sharing

We only share personal data with:

- Relevant project stakeholders (architects, consultants, clients).
- Professional advisers (lawyers, accountants, HR consultants).
- Regulatory authorities (HMRC, HSE) as required by law.
- Approved suppliers and subcontractors (under strict data agreements).

We do not sell or share personal data for marketing purposes.

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## 8. Data Retention

We retain data only for as long as necessary:

- Project files: 6–12 years (depending on contract type).
  - HR and payroll records: 6 years from employment end date.
  - CCTV: Up to 30 days (unless required for investigation).
  - Enquiries or tenders: 2 years (unless the contract is awarded).
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## 9. Individual Rights

All data subjects have the right to:

- Access their personal data.
- Request rectification or deletion.
- Object to or restrict processing.
- Request data portability.
- Lodge a complaint with the ICO.

Requests should be made in writing to:

**Data Protection Officer**

Thornwood Design & Build Ltd

Unit 30, Wintry Park Farm, Thornwood Road, Epping, Essex, CM16 6TB

Email: [Info@thornwood.co.uk](mailto:Info@thornwood.co.uk)

We will respond within one calendar month.

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## 10. Training & Awareness

All Thornwood employees receive training on data protection as part of onboarding and ongoing compliance. Subcontractors and temporary staff are briefed on-site protocols and relevant policies.

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## 11. Data Breaches

In the event of a data breach:

- We will assess the risk to individuals.
  - Report to the ICO within 72 hours if required.
  - Inform affected individuals where necessary.
  - Document the breach and corrective actions.
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## 12. Policy Governance

This policy is approved by the Managing Director and is reviewed annually or after any significant changes to legislation, operations, or risk level.

Signed: Thomas Burton

Date: 1<sup>st</sup> April 2025



Position: Founder & Managing Director