



Our Privacy Policy

Kevin Thomas Construction Services Ltd (KTCS)

Policy effective 25 May 2018
Available freely at www.thomaswond.com or on request



Contents

1	INTRODUCTION	3
1.1	OUR COMMITMENT	3
1.2	WHAT IS PERSONAL DATA?	3
2	WHAT DATA DO WE COLLECT AND HOW DO WE USE IT?.....	4
3	SECURITY OF DATA	5
4	DATA SUBJECT RIGHTS	6
5	OUR WEBSITE	8
5.1	WEBSITE VISITOR TRACKING	8
5.2	DOWNLOADS & MEDIA FILES.....	8
5.3	CONTACT & COMMUNICATION WITH US	9
5.4	SOCIAL MEDIA POLICY & USAGE.....	9
6	IN THE EVENT OF A BREACH	10
7	QUERIES AND REQUESTS.....	11



1 Introduction

1.1 Our commitment

Kevin Thomas Construction Services Ltd (KTCS) is committed to complying with data protection law and to respecting the privacy rights of individuals.

Whilst the majority of data that we store is 'non-personal', where personal data is received this policy explains how we protect it, in line with GDPR and the Data Protection Act 2018.

1.2 What is personal data?

Personal data is defined by the General Data Protection Regulation (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 therefore 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.



2 What Data do we collect and how do we use it?

We will normally collect personal and non-personal information for the following purposes:

- To provide and operate our services.

This information may include:

- Names, email addresses, job titles, telephone numbers, and physical addresses strictly for business purposes (for instance to execute projects);
- Project details such as building locations, building uses, plans and planning documents;
- Invoicing information;
- Responses to ITTs;
- Project contracts;

By contacting us with an enquiry, to execute a project or to tender for project items you are consenting to us contacting you with regard to current and upcoming projects.

In the course of our work we may need to share this data with others such as other consultants or our clients.

We will not use your personal data or pass it onto 3rd parties for marketing purposes.



3 Security of Data

We are careful to store your data securely in order to prevent unauthorised access. Security procedures in the form of electronic/digital and physical/hard copy data are in place as well as related managerial and staff training and procedures.

Our website is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to advertise our services to you. The data processed through Wix.com is minimal and includes only details of queries you input into our contact form such as name, email and details within your message. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall. See section 5 for further information about our website and your information. We will never ask you for your bank details over this platform and remind you to be cautious with any online activity you partake in.

No personal data will be disclosed to 3rd parties not involved in the projects to which your details relate.

Most data are held electronically and are protected from unauthorised persons by password protection and security software.



4 Data subject rights

Under Data Protection Laws individuals have certain rights in relation to their own personal data. In summary these are:

- The rights to access their personal data (a subject access request);
- The right to have their personal data rectified;
- The right to have their personal data erased, usually referred to as the right to be forgotten;
- The right to restrict processing of their personal data;
- The right to object to receiving direct marketing materials;
- The right to portability of their personal data;
- The right to object to processing of their personal data; and
- The right to not be subject to a decision made solely by automated data processing.

The exercise of these Rights may be made in writing, including email, and also verbally and should be responded to in writing by us without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. We must inform the individual of any such extension accompanied by an explanation within one month of receipt of the request.

Where the data subject makes the request by electronic form, any information is to be provided by electronic means where possible, unless otherwise requested by the individual.



If we receive the request from a third party (e.g. a legal advisor), we must take steps to verify that the request was, in fact, instigated by the individual and that the third party is properly authorised to make the request. This will usually mean contacting the relevant individual directly to verify that the third party is properly authorised to make the request.



5 Our website

Our website is hosted by Wix.com and this policy contains details about how we or they might use your data.

Our website uses cookies to better the users experience while visiting the website. As required by legislation, where applicable this website uses a cookie control system, allowing the user to give explicit permission or to deny the use of/saving of cookies on their computer/device (these settings usually exist in a user's browser).

5.1 Website Visitor Tracking

Our website uses tracking software to monitor visitors to better understand how they use the site. The software will save a cookie to your computer in order to track and monitor your engagement and usage of the website, but **will not** store, save or collect personal information.

We collect the Internet protocol (IP) address used to connect your computer to the Internet. We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page.

5.2 Downloads & Media Files

Some documents can be downloaded from our website these are provided to users at their own risk. Whilst all precautions have been undertaken to ensure their safety, users are advised to verify their authenticity using antivirus software or similar applications.



5.3 Contact & Communication With us

Users contacting us through this website do so at their own discretion and provide any such personal details requested at their own risk (principally through the contact form). Your personal information is kept private and stored securely until a time it is no longer required or has no use.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you services information through a mailing list system.

5.4 Social Media Policy & Usage

We will never ask for user passwords or personal details on social media platforms.

Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page.



6 In the event of a breach

In the event of a data breach we will:

- 1) Identify the breach, the data compromised and means;
- 2) Attempt to contain the breach and recover data (for instance changing passwords or remotely disabling devices).
- 3) Assess the extent and nature of the breach to understand the sensitivity and impact of the data breached. This will influence how we proceed with dealing with the breach;
- 4) Report the breach to clients or individuals. If the breach does not contain sensitive data this may occur after the breach has been resolved in order to fully outline the situation;
- 5) Perform a 'lessons learned' exercise and implement any relevant actions to prevent future data breaches.



7 Queries and Requests

If you would like to: access, correct, amend or delete any personal information we have about you, you are invited to contact us on the details below:

Kevin Thomas (Director; Data Protection Lead, KTCS Ltd)
Fernlea, Bridle Lane, Stanton, Derbyshire, DE15 9TQ
kevin@ktcsLtd.com
www.ktcsLtd.com