

## Privacy Policy

During the course of our activities we, will process personal data (which may be held on paper, electronically, or otherwise) about our staff and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the General Data Protection Regulations (DPA 2018), the Human Rights Act 1998 (HRA) and the common law duty of confidentiality. Warden Construction Ltd recognises the importance of protecting personal and confidential information in all that we do, and takes care to meet its legal duties. The purpose of this policy is to make you aware of how we will handle your personal data. Anyone processing personal data must comply with the eight principles of good practice. Data must be fairly and lawfully processed, processed for limited purposes, adequate, relevant and not excessive, accurate, not kept longer than necessary, processed in accordance with the data subject's rights, secure and not transferred to countries without adequate protection.

### Personal Data

“Personal data” means recorded information we hold about you from which you can be identified. We only collect and use your information for the lawful purposes of administering the business of Warden Construction Ltd. These purposes include: accounting and auditing, accounts and records, advertising, marketing & public relations, consultancy and advisory services, crime prevention and prosecution of offenders, education, carrying out contracts, information administration, research and sharing and matching of personal information for national fraud initiative.

### What types of personal data do we handle?

We process personal information to enable us to provide the service agreed, maintain our own accounts and records, promote our services, and to support and manage our employees. We also use information to support and monitor our services to enable us to deliver to the highest standard.

The types of personal information we use include: personal details such as names, addresses, telephone numbers, family details for example next of kin details, education & training, employment details, for example for those that work for us either directly or are commissioned by us to provide a service, financial details, where we provide payment, visual images, personal appearance and behaviour, for example if CCTV images are used as part of building security & responses to surveys, where individuals have responded to surveys for example, employee engagement, feedback surveys. We also process sensitive classes of information that may include: racial and ethnic origin, offences (including alleged offences), criminal proceedings, outcomes and sentences, trade union membership, religious or similar beliefs and employment tribunal applications, complaints, accidents, and incident details. This information will generally relate to our employees.

### How will we use information about you?

Your information is used to run and improve Warden Construction Ltd. It may be used to: check and report on how effective Warden and the services it commissions has been, investigate complaints, legal claims or important incidents, make sure services are planned to meet needs in the future, review the services given to make sure it is of the highest possible standard and to comply with & complete contracts, this may be by sometimes sharing information with other organisations for a specific, justified purpose and approved by Warden Construction Ltd. We may keep your information in written form or on a computer.

### Sharing your information

There are a number of reasons why we share information. This can be due to our obligations to comply with current legislation, our duty to comply with a court order and you have consented to disclosure.

### Retaining information

We will only retain information for as long as necessary. Records are maintained in line with Warden Construction Ltd Data Register, which determines the length of time records should be kept for.

### Security of your information

We take our duty to protect your personal information and confidentiality seriously. We are committed to taking all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, whether computerised or on paper. All staff are required to protect your information, and inform you of how your information will be used.

## Information for job applicants

Warden Construction Ltd will process information provided by applicants for the management of their application and the subsequent selection process. This involves providing details to the short-listing and selection panels. Other details are kept to help fulfil our obligations to monitor equality and diversity within the organisation and in the application process. You can find more information about the use of personal data throughout the application process.

Information will be retained on interview performance and the application in line with the retention periods of Warden Construction Ltd. For more information about your application and personal data contact the Head Office at Kirkham.

## How to access your personal information

The UK GDPR gives you the right to see the information that Warden Construction Ltd holds about you and why. Requests must be made in writing and you will need to provide:

- adequate information [for example full name, address, date of birth, etc.] so that your identity can be verified and your information located.
- an indication of what information you are requesting to enable us to locate this in an efficient manner.

Where a fee is applicable under the terms of the UK GDPR and subsequent legislation, we will inform you in writing.

We aim to comply with subject access request (SAR) to personal data as quickly as possible. We will ensure that we deal with requests within 30 days of receipt unless there is a reason for delay that is justifiable under the UK GDPR. We want to make sure that your personal information is accurate and up to date. If you think any information is inaccurate or incorrect then please let us know by contacting the Head Office at Kirkham.

## Opt out process

If you no longer wish for us to store & process your personal details when required, please request this in writing to the HR department. We will ensure we deal with this request within 30 days of receipt unless there is a reason for delay that is justifiable under the UK GDPR.

## Website Cookies & Google Analytics

The Warden Construction website ([www.warden.co.uk](http://www.warden.co.uk)) does not collect data which can identify you personally, such as name, address, telephone number, or email address.

Cookies are small data files which are downloaded by your browser onto your computer or mobile device. Our website is hosted by 20i Limited. Google Analytics uses cookies to collect anonymous information about visitor behaviour, such as which pages a visitor views, how long they spend on each page, and the visitor's journey throughout the website. We do not currently have access to Google Analytics and therefore are unable to share any information. The information collected by these cookies is aggregated and cannot be used to identify our site visitors. You may refuse the use of cookies by disabling cookies in your browser. By using our website you consent to cookies being used for Google Analytics purposes.

## Changes to this Privacy Notice

This Privacy Policy was last updated on 3rd January 2025. We reserve the right to make changes to our Privacy Policy in the future, and any updates will be posted here. It is important that our records are correct, as inaccurate or out of date information may affect your salary or cause difficulties in situations where contact is required for emergencies. You must notify your HR / Finance immediately of all changes in the following personal information: name, home address, telephone number, bank account details, examinations passed/ qualifications gained, emergency contact, driving licence penalties (if you are required to drive on Company business), criminal charge, caution or conviction and conflict, or potential conflict of interest.

This policy will be continually monitored and reviewed to ensure its effectiveness.

**Ian Williams**  
Managing Director



**Signed 06/01/2026**

**Next review: January 2027**