



# PRIVACY POLICY STATEMENT

D&D Rail Limited is a Limited Company incorporated in England and Wales and acts in the capacity of a 'controller' under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

D&D Rail Limited complies with the data protection principles set out in the GDPR. These provide that data must be:

- processed lawfully, fairly and transparently
- collected for specific, explicit and legitimate purposes (and not used for anything else)
- adequate, relevant and limited to what is necessary
- accurate and kept up to date where necessary
- retained for no longer than necessary; and
- kept secure.

## **Whose data do we hold?**

We may hold data about the following people:

- Employees and potential employees
- Clients
- Suppliers (including sub-contractors) and service providers
- Advisers, consultants and other professional experts
- Complainants and enquirers

## **The types of data we collect**

We will only collect information from you that is relevant to the matter that we are dealing with. In particular we may collect the following information from you which is defined as 'personal data':

- Personal details, such as name, address and email address
- Financial details
- Business activities of the person whose details we are processing

For individuals applying for career opportunities, such as job applications:

- The only personal data we hold is that which has been voluntarily submitted
- The purpose for which we hold this data is to be able to notify the individual concerned about employment opportunities
- Users can unsubscribe and opt-out of receiving communications any time they like
- We will never sell or otherwise give away personal data
- We can retrieve and supply the data held on any user upon request
- We will delete the data held on any user upon request



## Special Categories

We may also collect information that is referred to as being in a 'special category'. This could include:

- Racial or ethnic origin
- Religious beliefs or other beliefs of a similar nature

This data would only be collected if deemed to be in the interests of the individual and for the purposes of enabling the company to support the individual.

## Processing Data

The basis on which we process your personal data is as follows:

- It has been voluntarily provided by you, or you have authorised our access to it on your behalf
- It is necessary for the performance of our contract with you
- It is necessary for us to comply with a legal obligation, including contractual obligations
- It is in our legitimate interest to do so
- You have given us your consent (this can be withdrawn at any time by contacting [info@ddrail.com](mailto:info@ddrail.com))
- We can retrieve and supply the data held on any user upon request
- We will delete the data held on any user upon request providing there is no legal obligation for us to retain this information (see below, Retention of Information).

## How data is used

We may use your data for the following purposes:

- Maintaining project accounts and administrative records
- Accounting and financial functions, including accounts payable/ receivable and payroll
- Maintaining personnel files
- Keeping clients informed about our goods and services

## Who will we share your data information with?

- External third parties who carry out payroll and accounting services, only for legitimate reasons for processing payroll and complying with HMRC requirements.
- Pension providers.
- We will never sell or otherwise give away personal data.

## Retention of Information

- By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after cessation of contracts for tax purposes.
- PAYE records are kept for 3 years after the tax year to which they relate for HMRC purposes.
- Payroll records are kept for 6 years for HMRC purposes.

### International transfers

- We have no requirement to make international transfers of your personal data to a country outside of the EEA.

### Data Security

- All the information that is provided to us will be kept secure using appropriate technical and organisational measures
- In the event of a personal data breach we have in place procedures to ensure that the effects of such a breach are minimised and shall liaise with the Information Commissioner's Office (ICO) and with you as appropriate
- More information can be obtained by contacting [info@ddrail.com](mailto:info@ddrail.com)

### Your Rights

You have the following rights under the GDPR:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

### Complaints

- If you are unhappy about how we are using your information or how we have responded to your request then initially you should contact [info@ddrail.com](mailto:info@ddrail.com)
- If your complaint remains unresolved then you can contact the ICO, details available at [www.ico.org.uk](http://www.ico.org.uk)

This policy is to be reviewed annually (as a minimum) unless there are changes in the responsibilities of the persons named within it or other changes of substance, in which case a revised policy will be issued immediately to all existing policy holders.

A handwritten signature in black ink, appearing to read 'David Farrow', written over a thin horizontal line.

**David Farrow** M.B.E.  
Managing Director

**1<sup>st</sup> July 2019**