

THE BARNES GROUP PRIVACY POLICY

This policy explains how the Barnes Group uses the personal information provided by our sub-contractors and consultants in the operation of our business. It also describes how long the information is kept for and the limited circumstances in which we may disclose it to third parties.

PERSONAL DETAILS WE HOLD ARE LIMITED TO:

- ◆ Sub-contractor and consultant personal names, addresses and contact details as provided by the individual where they have no business address or separate business contact details.
- ◆ Sub-contractor and consultant records include emails, postal interactions and payment details.

LENGTH OF TIME INFORMATION WILL BE HELD

We will hold the above details whilst we are still interacting with the sub-contractor or consultant and they wish to be on our list of sub-contractors or consultants for future offers of work. If we have not interacted during the past 6 years, then we will remove your details from our records.

HOW TO ACCESS YOUR PERSONAL DATA

If you wish to review the personal information, we hold about you please contact our head office via owl@barnesgroup.co.uk

KEEPING YOUR DETAILS SECURE

Your details are kept in hardcopy, where you have provided your information on a sub-contractor or consultant questionnaire, and on our sub-contractor or consultant database. Access to the database is limited to those in the business who have reason to contact you such as a quantity surveyor, pre-contracts estimator or site manager.

We hold information within our accounts team to pay you for work. The information is held on the Summit 3000 accounting system.

ALL COMPUTER DATA IS SECURED AND BACKED-UP IN THE FOLLOWING WAYS:

- ◆ Data is backed up to a secure location at Head Office and the backup backed up to second secure off-site location.
- ◆ All data is stored on redundant disk arrays.
- ◆ Firewalls are used to protect internal networks, scan, and analyse traffic and to detect threats.
- ◆ Desktop and server anti-malware protection are installed.
- ◆ Multi-layered Anti-spam and malware protection is in place to protect email.
- ◆ Individual users have their own unique log on.
- ◆ Computer policy explains fully the proper use of the hardware and software issued to staff including

how to create a complex password; policy issued to staff at induction and contained within the Employee Handbook which is reviewed annually.

- ◆ Computer terminal automatically locks with lack of use after a set period of time (20 minutes).
- ◆ Email is auditable to detect inappropriate use of data.

SHARING PERSONAL INFORMATION

We do not generally share personal data you have provided other than with those organisations with a valid need to check information e.g., tax office and external auditors.

PERSON RESPONSIBLE FOR PERSONAL DATA

John Goosen, Head of Finance will oversee personal data held by The Barnes Group and has responsibility and authority to follow the General Data Protection Regulations (GDPR). The Barnes Group includes Barnes Construction, Bower Fuller and J T Wilding Ltd.

John's contact details are owl@barnesgroup.co.uk or by telephone 01473 272222

PROCESSING OF PERSONAL DATA

Under the GDPR you have the following rights to request information from the company:

- ◆ Right of access to the data (Subject Access Request)
- ◆ Right for the rectification of errors
- ◆ Right to erasure of personal data (please note, this is not an absolute right)
- ◆ Right to restrict processing or to object to processing
- ◆ The right to portability



Signed:
Mark Hart



Signed:
Bob Steward

Joint Divisional Managing Directors

For and on behalf of the Directors

Dated January 2022