



## Data Protection Policy

**Company Name:** Midas Scaffolding Ltd

**Effective Date:** 10.10.2025

**Review Date:** 10.10.2026

### 1. Purpose

The purpose of this policy is to ensure that Midas Scaffolding Ltd complies with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

We are committed to protecting the privacy and security of personal data belonging to our employees, clients, contractors, and suppliers.

### 2. Scope

This policy applies to:

- All employees, directors, and contractors of Midas Scaffolding Ltd.
- All personal data processed by the company, whether stored electronically, on paper, or by other means.
- All business activities, including scaffolding operations, site management, HR, payroll, and customer communications.

### 3. Data Protection Principles

We adhere to the **seven key principles** of data protection. Personal data will be:

1. **Lawfulness, fairness and transparency** – processed fairly, lawfully and transparently.
2. **Purpose limitation** – collected for specific, legitimate purposes and not used in ways incompatible with those purposes.
3. **Data minimisation** – adequate, relevant, and limited to what is necessary.
4. **Accuracy** – kept accurate and up to date.
5. **Storage limitation** – kept no longer than necessary.
6. **Integrity and confidentiality** – processed securely to prevent unauthorised access, loss or damage.
7. **Accountability** – Midas Scaffolding Ltd is responsible for, and must be able to demonstrate, compliance with these principles.

### 4. Legal Basis for Processing

We process personal data only when one or more of the following legal bases apply:

- **Performance of a contract** (e.g. employee contracts, client contracts).
- **Legal obligation** (e.g. health & safety records, tax records).
- **Legitimate interest** (e.g. managing business operations and communications).
- **Consent** (e.g. using photos for marketing, where appropriate).

## 5. Types of Data We Collect

Depending on our relationship with the individual, we may collect:

- **Employees:** Name, contact details, emergency contacts, bank details, qualifications, right-to-work information, health and safety training records.
- **Clients and Suppliers:** Contact names, email addresses, telephone numbers, business addresses, and invoicing information.
- **Site Visitors or Subcontractors:** Identification and safety compliance information.

## 6. Data Storage and Security

- Electronic data is stored on secure, password-protected devices and systems.
- Paper records are kept in locked cabinets and only accessible to authorised staff.
- Personal data is not stored on personal devices unless authorised and protected by encryption or password.
- All staff are trained to handle data responsibly and report any concerns immediately.

## 7. Data Retention

We retain data only as long as necessary:

- Employee records: **6 years** after leaving employment
- Financial records: **6 years** for tax purposes
- Project/site records: **As required by contract or insurance**
- Complaints or incidents: **Minimum 3 years**

At the end of the retention period, data will be securely destroyed or deleted.

## 8. Sharing Personal Data

We may share personal data with:

- HMRC or other government authorities (where legally required)
- Insurers or legal advisers (in relation to claims or compliance)
- Contractors and clients (for legitimate operational reasons)

We never sell personal data.

Where third parties process data on our behalf, we ensure a written data processing agreement is in place.

## 9. Data Subject Rights

Individuals have the right to:

- Access their personal data
- Request correction or deletion
- Object to or restrict processing
- Request transfer of data (data portability)
- Withdraw consent (where applicable)

Requests should be made in writing to the Data Protection Officer (see Section 12).

We will respond within **one month**.

## 10. Data Breach Procedure

Any suspected data breach (loss, theft, or unauthorised access) must be reported immediately to the **Data Protection Officer (DPO)**.

The DPO will:

1. Assess the risk and impact
2. Record the incident
3. Notify the **Information Commissioner's Office (ICO)** within **72 hours** if required
4. Inform affected individuals where necessary

## 11. Employee Responsibilities

All employees must:

- Handle personal data carefully and only for legitimate purposes
- Keep passwords secure and systems locked when unattended
- Report any breaches or concerns immediately
- Not share or disclose data without authorisation

Breaches of this policy may result in disciplinary action.

## 12. Data Protection Officer (DPO)

As a small business, Midas Scaffolding is not legally required to appoint a formal DPO. However, the Managing Director is responsible for overseeing compliance.

### Data Protection Contact:

Name: Ben Green

Email: [info@midasscaffolding.co.uk](mailto:info@midasscaffolding.co.uk)

Phone: 01920 87700

## 13. Review and Approval

This policy will be reviewed **annually** or sooner if there are significant changes to UK data protection law or our operations.

## 14. Policy Approval

Signed:

Name:

Date:



Ben Green – Managing Director

10.10.2025