

## **Data Protection Policy**

### **1. Policy Statement**

Rosbo LTD is committed to protecting the rights and freedoms of individuals with respect to the processing of personal data.

We recognise that personal data must be handled lawfully, fairly, transparently and securely. We are committed to complying fully with UK GDPR and the Data Protection Act 2018.

This policy applies to:

- Employees
- Subcontractors
- Clients
- Suppliers
- Job applicants
- Any other individuals whose personal data we process

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### **2. Scope of Data Processing**

Rosbo LTD processes personal data in relation to:

- Customer enquiries and contracts
- Employee records
- Subcontractor information
- Supplier details
- Website analytics
- Health & safety documentation
- Financial records

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### **3. Definitions**

**Personal Data:** Any information that identifies or can identify a living individual.

**Special Category Data:** Sensitive data such as health information, race, religion, etc.

**Processing:** Any operation performed on personal data (collection, storage, use, deletion, etc.).

**Data Controller:** Rosbo LTD determines the purposes and means of processing personal data.

## 4. Data Protection Principles

Rosbo LTD will ensure personal data is:

1. Processed lawfully, fairly and transparently
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and kept up to date
5. Retained only as long as necessary
6. Processed securely and protected against unauthorised access
7. Accountable and demonstrably compliant

## 5. Lawful Bases for Processing

We process personal data under the following lawful bases:

### Contract

To provide roofing, carpentry and skylight services.

### Legal Obligation

To comply with tax, employment, insurance and health & safety laws.

### Legitimate Interests

To operate and improve our business.

### Consent

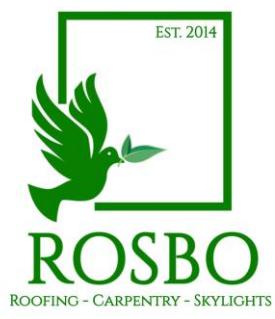
For marketing communications where applicable.

Special category data (e.g. health information for workplace safety) is processed only where necessary and legally permitted.

## 6. Types of Personal Data Collected

### Customer Data

- Name



## Rosbo LTD T/A Rosbo Roofing, Carpentry & Skylights

4 Western Road

Bletchley

MK22PT

Company Registration: 13058965

[www.rosboroofting.com](http://www.rosboroofting.com)

info@rosboroofting.com

- Address
- Email address
- Phone number
- Property details
- Payment details

## Employee Data

- Contact details
- National Insurance number
- Bank details
- Employment history
- Right-to-work documentation
- Training records
- Health information (where relevant to safety)

## Subcontractor Data

- Contact information
- Insurance certificates
- Qualifications
- Payment information

## Website Data

- IP address
- Browser information
- Cookie data

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## 7. Data Collection & Minimisation

Rosbo LTD will:

- Only collect data necessary for business purposes
- Avoid excessive or irrelevant data collection
- Inform individuals why data is being collected
- Provide privacy information at the point of collection

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## 8. Data Security

We implement appropriate technical and organisational measures including:

- Password-protected systems

- Restricted access to sensitive data
- Secure cloud storage
- Encrypted devices where possible
- Secure disposal of paper records
- Antivirus and firewall protections

Physical files are stored securely and access is limited to authorised personnel.

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## 9. Data Retention

We retain personal data only as long as necessary:

- Financial records: Minimum 6 years (HMRC requirement)
- Contract documentation: 6 years
- Health & safety records: As legally required
- Recruitment records: 6–12 months unless required longer
- Marketing data: Until consent is withdrawn

At the end of retention periods, data is securely deleted or destroyed.

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## 10. Data Subject Rights

Individuals have the right to:

- Access their personal data
- Request rectification
- Request erasure
- Restrict processing
- Object to processing
- Request data portability
- Withdraw consent

Requests must be submitted in writing and will be responded to within one calendar month.

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## 11. Data Breaches

A data breach includes:

- Loss of personal data
- Unauthorised access
- Accidental disclosure

- Cyber incidents

If a breach occurs, Rosbo LTD will:

1. Contain the breach
2. Assess risk to individuals
3. Record the breach
4. Notify the ICO within 72 hours if required
5. Notify affected individuals if there is a high risk

All breaches are reviewed to prevent recurrence.

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## 12. Third-Party Processors

Where third parties process data on our behalf (e.g., accountants, payroll providers, IT providers), we ensure:

- Data processing agreements are in place
- Adequate security measures are implemented
- Data is processed lawfully

We do not sell personal data.

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## 13. International Data Transfers

We do not intentionally transfer personal data outside the UK.

If data is transferred via cloud providers or third-party systems, we ensure appropriate safeguards are in place.

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## 14. Employee Responsibilities

Employees and subcontractors must:

- Handle personal data securely
- Not share confidential information improperly
- Lock devices when unattended
- Report suspected breaches immediately
- Follow company data handling procedures

Failure to comply may result in disciplinary action.

## 15. Special Category Data

Where health or medical information is required (e.g., fitness to work at height), it will:

- Be processed only where necessary
- Be stored securely
- Be accessible only to authorised personnel
- Be retained only as long as required

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## 16. Monitoring & CCTV (If Applicable)

If CCTV or monitoring is used:

- Individuals will be informed
- Footage will be retained only as necessary
- Access will be restricted

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## 17. Record of Processing Activities

Rosbo LTD maintains records of:

- Categories of data processed
- Lawful basis
- Retention periods
- Security measures

These records are reviewed periodically.

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## 18. Training & Awareness

The Director is responsible for ensuring awareness of:

- Data protection principles
- Data breach procedures
- Secure data handling

Staff will receive guidance appropriate to their role.

## **19. Complaints**

Individuals may raise concerns directly with Rosbo LTD.

If unresolved, complaints may be made to the Information Commissioner's Office.

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## **20. Review & Continuous Improvement**

This policy will be:

- Reviewed annually
- Updated following legislative changes
- Revised after any significant data breach
- Reviewed if business operations change

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## **21. Responsibility**

The Director of Rosbo LTD has overall responsibility for data protection compliance.

All employees and subcontractors share responsibility for protecting personal data.