

How your information will be used

J S Wright & Co Ltd will be what is known as the “controller” of the personal data you provide to us. Personal data is data which by itself or with other data available to you, can be used to identify a person. Our company registration number is 309551 and its registered address is: The Atlas Building, 16 Portland St, Aston, Birmingham, B6 5RX.

1. As your employer, the company needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time your employment ends and after you have left. This includes using information to enable us to comply with your employment contract, to comply with any legal requirements, to pursue the legitimate interests of the company and to protect our position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.
2. As a company pursuing the design and installation of building services, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes.
3. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees.
4. The sort of information we hold includes your application form and references, your contract of employment and any amendments to it, correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary, information needed for payroll, benefits and expenses purposes, contact and emergency contact details, records of holiday, sickness and other absence, information needed for equal opportunities monitoring and records relating to your career history, such as training records, appraisals, other performance measures, photographs of you taken during induction and any company events, and, where appropriate, disciplinary and grievance records and accident details.
5. You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company. You should refer to the General Data Protection Policy which is available on the company website.
6. Visual images of you performing your daily tasks at work or at company events may on occasions be published on the company’s website or other promotional material including the Wright Standard, which is the company quarterly magazine.
7. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations, to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay or life insurance policies.
8. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
9. In addition, we monitor data usage through mobile telephone and tablet use, as detailed in our Electronic Information, Internet and Communications Policy, available in the company handbook, and in the Mobile Device Policy, which is available on the company intranet. On some of our construction sites we may keep records of your hours of work by way of a biometric system; this data is stored on an external supplier Cloud-based system. Data will be held for one month.

10. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to pension or health insurance schemes.
11. We may transfer information about you to other group companies for purposes connected with your employment or the management of the company's business.
12. We retain personal data only for as long as is necessary for the purposes for which we process it.
13. It is important that the information contained in our records is both accurate and up-to date. If your personal information changes during the course of your employment please keep us informed.
14. If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

Your rights

1. Under the General Data Protection Regulation (GDPR) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability. A request for disclosure of such information is called a subject access request. Any such requests should be addressed to the HR department.
2. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
3. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that the company has not complied with the requirements of the GDPR with regard to your personal data.

J S Wright wishes to honour individuals' rights in relation to their personal data. If you have any concerns as to how your data is processed you can contact the HR department at Head Office.

Phil Leech
Managing Director
November 2019