



# SUSTAINABILITY POLICY

## MISSION

Our aim is ensure sustainability is considered in the design, procurement and delivery of our services and products and to comply with or exceed all applicable legal requirements. . We are committed continual improvement and to integrating a sustainable approach to our operations which will promote environmental, social and economic benefits those areas where we have direct control or the ability to influence others and to meet the needs of all stakeholders – customers, suppliers, partners and the wider community.

## STATEMENT

Delivery of this policy shall be achieved by:

- incorporating the ethos of sustainability into the values of the company
- continually monitoring performance and learning from the results reporting our progress, achievements and weaknesses
- communicating openly with our staff, clients, and suppliers and other stakeholders

Our sustainability strategy covers 3 key areas:

### People

- Give structured and ongoing training to all employees to enable them to achieve the above aims and to encourage them to adopt these standards as a way of life;
- Meet national and international standards of social responsibility, including social inclusion, equality and human rights.
- Conduct our business activities to ensure the health, safety and wellbeing of all stakeholders affected by our activities.
- Reduce the incidence rate of all accidents
- Where practicable use local labour to address the social aspect of sustainability;

### Natural Resources

- Progressively increase resource efficiency, reduce dependence on non renewable resources and reduce our carbon footprint.
- Minimise waste to landfill.
- Prevent pollution in all its forms and protect biodiversity.
- the promotion of best practice construction procurement and supply side integration.
- Establish working practices which will reduce the consumption of raw materials and energy resources;
- Promote waste management initiatives to increase opportunities for reusing and recycling materials;
- Use materials with a high recycled content where practicable;
- Use low emission transport for all company vehicles and reduce fuel consumption by good logistical planning;

### Community

- Continue to engage with communities in key areas relative to our business.
- Progressively improve the capability and sustainability of our supply chain.
- Instigate communication with all relevant stakeholder groups.
- Good design is synonymous with sustainable construction ensure that buildings, infrastructure, public spaces and places are buildable, fit for purpose, resource efficient, sustainable, resilient, adaptable and attractive.

The responsibility for the implementation of this policy lies with the Managing Director

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**Paul Cockle**

Managing Director  
January, 2018



# HEALTH & SAFETY POLICY STATEMENT

## Mission

Bridgford Interiors is fully committed to the objective of accident prevention by providing safe workplaces for all employees, its property, third parties and their property and other persons who may be affected by its activities and its responsibility to protect the environment.

## Statement

We promote a culture of occupational health & safety protection in all Company systems and procedures, under the direction of the senior management team and with the support of all employees and supply chain partners.

The Company recognises that health and safety issues are an integral part of its business performance and are committed to achieving continual and effective improvements through appropriate initiatives, controls, provisions of resources and training of employees to comply with our legal obligations-as a minimum.

Bridgford Interiors believes that continual consultation with employees is fundamental to its success. We will consult employees with regards to their health and safety at work, including any change which may substantially affect their health and safety at work.

Management objectives and targets are established and reviewed on a regular basis to implement the Health & Safety Policy so far as is reasonably practicable, to ensure that the responsibilities for health and safety are properly assigned, accepted and fulfilled at all levels of the company. These include:

- Providing a documented 'safe system of work' for all work activities carried out and in such a way that persons not in our employment who may be affected are not exposed to risks to their health and safety
- Setting annual targets towards a zero accident rate
- Identifying and assessing hazards and applying the necessary control measures in a consistent manner at all times
- Ensuring that employees receive appropriate information, instruction, training and supervision so that they are able to carry out their duties in a safe and efficient way
- Provision and maintenance of a safe place of work of all employees and sub-contractors including safe access and egress to it including plant, equipment and systems of work and safe arrangements for the use, handling, storage and transport of articles and substances
- Providing suitable supervision along with the necessary instruction and information
- Arranging for comprehensive and effective consultation between the Directors and employees regarding all matters concerning Health and Safety at work
- Incorporating health and safety considerations in the design of products and services.
- Monitoring and reviewing Health and Safety activities on a regular basis and implementing any necessary improvements
- Ensuring that sufficient financial and physical resources are provided to implement this policy
- To provide suitable and sufficient welfare provisions for all employees on and off site.

It shall be the duty of every employee and sub-contractor at work to:

- Co-operate with company management, so far as is necessary to enable the employer to carry out their legal duty under the Health and Safety at Work etc. Act 1974,
- Take reasonable precautions for the health and safety of themselves and of other persons who may be affected by their acts or omissions at work,
- Not interfere intentionally or recklessly with anything provided for their health, safety or welfare.

The Policy Manual defines the levels of individual responsibility and arrangements throughout the company. Eventual responsibility for fulfilling the defined responsibilities and arrangements is vested in the undersigned:

The Company recognises the requirement for all employees and sub-subcontractors to be fully committed to the application of the provisions of this policy. Full support will be given continuously to all personnel so that a positive attitude to Health and Safety matters will be maintained.

Paul Cockle, Managing Director, January 2018

# ETHICAL BUSINESS POLICY



Bridgford Interiors Ltd (The Company) Code of Conduct is intended to provide guidance for employees in relation to the standards that the Company expects in the conduct of its operations. The Code has been endorsed by the Board of Directors and applies to all employees in the business.

**CONFLICT** - There may be times when our personal interests conflict with those of the Company or our customers. In these circumstances, we should take action to remove or manage the conflict so as to avoid detriment to the Company or our customers.

**INSIDER TRADING** - If you have non-publicly known, price sensitive information about a company or its businesses such as; information about a proposed major project or contract, or information about a client or strategic partner that has come to your knowledge through your employment with the Company, then you must not deal in that entity's securities or pass that information on to another person or encourage another person to deal in that entity's securities. By "securities" we mean shares, units or any form of derivatives such as warrants or options. In addition to being a breach of our Code, penalties for insider trading under the laws of most countries in which we operate are severe.

**UNAUTHORISED GAINS OR PAYMENTS** - As a general rule, don't accept or offer to give gifts, services, discounts gratuities or other gains from (or to) people who conduct business with the company. This principle has particular application where we are involved in a tender. The offering of bribes to anyone is prohibited outright. Breaking this principle could compromise all concerned and is illegal in most countries in which we operate.

**USE OF COMPANY ASSETS** The company's assets are critical to our business competitiveness and success. These assets include office equipment, our computer systems, the data on those systems (including the passwords allowing access to that data) and corporate charge cards. Assets are provided to you for conducting the companies business. Any use you make of these assets must be authorised.

**CONFIDENTIAL INFORMATION** - In the course of our duties we may learn confidential information about the company or its customers or suppliers. Unless we have permission we must not use or give out confidential information. This includes not giving confidential information to other business units in the company or using the information provided for a different purpose without first obtaining permission.

**EQUAL OPPORTUNITY** - The company has a long-standing commitment to equal opportunity for all its employees. Discrimination or harassment of any kind is totally inconsistent with our philosophy. This obviously makes good business sense as well as being fair to all concerned across Group companies. Maintaining our customers' confidence in our professionalism and integrity is too important to be put at risk by inappropriate behaviour.

**COMPETITION** – The Company is committed to fair competition in all markets in which we operate. When competing for business do so vigorously but fairly. This means not intentionally misleading clients, business partners, competitors or the community; only using our reputation in legitimate ways and refusing to associate in illegal market practices such as price fixing schemes or bid-rigging arrangements.

**ENVIRONMENT, HEALTH AND SAFETY IMPACTS** - We must take into account the impact of environment, health and safety issues when making business decisions. We must ensure that our business decisions do not compromise our commitment to avoiding any injury to people or damage to the environment and that we comply at all times with local laws.

**PUBLIC STATEMENTS** - Ensure all non-public price sensitive information concerning The Company or its businesses is disclosed to the managing Director before it is released publicly or widely disseminated within the Group.

Examples include: involvement in an emerging major project, a successful major tender, a major product launch, or a major business restructure, acquisition, joint venture or alliance.

Do not make comments which may be construed as representing the official views of the company. Only the managing Director and the executives he nominates are authorised to provide these comments.

**DONATIONS** - Donations of any kind may only be made by the managing Director. This does not, of course, restrict our right to attend functions in a personal capacity.

**BUSINESS POLICIES AND PROCEDURES** - We must make ourselves aware of the policies and procedures which affect our roles. In particular, we must be clear on our limits of authority and never exceed those limits by committing The Company verbally, in writing or by e-mail; or agree to restrict our business from competing in a market or from expanding into any new regions without the consent of the managing director.

**HELP EACH OTHER** - We work collaboratively and, within the bounds of commercial confidentiality, we should have an understanding of each other's responsibilities and actions. In this context, you may become aware of behaviour which seems to fail the test. Everyone needs help and guidance from time to time, particularly when faced with such an issue. Turning to colleagues for assistance in solving difficult problems shows good judgement and common sense.

Don't be afraid to ask, and never be reluctant to help.

**Paul Cockle**  
Managing Director  
January, 2018

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# EQUAL OPPORTUNITIES EMPLOYMENT POLICY



## Mission

The objectives of this Equal Opportunities Employment Policy are to:

- Ensure that the company/etc has access to the widest labour market and secures the best employees for its needs.
- Ensure that no applicant or employee receives less favourable treatment, and that, wherever possible, they are given the help they need to attain their full potential to the benefit of the company/etc and themselves.
- Achieve an ability-based workforce which is in line with the working population mix in the relevant labour market areas.

## Vacancy Advertising

Wherever possible, all vacancies will be advertised simultaneously internally and externally. Steps will be taken to ensure that knowledge of vacancies reaches underrepresented groups internally and externally.

Wherever possible, vacancies will be notified to job centres, careers offices, schools, colleges, polytechnics, etc, with significant minority group rolls, as well as to minority press/media and organisations. All vacancy advertisements will include an appropriate short statement on equal opportunity.

## Selection and Recruitment

Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job. Wherever possible, more than one person must be involved in the selection interview and recruitment process, and all should have received training in equal opportunities.

Wherever possible, women, minorities and disabled persons will be involved in the shortlisting and interviewing processes.

Reasons for selection and rejection of applicants for vacancies must be recorded.

## Positive action - training, promotion and conditions of service

Underrepresented groups will be encouraged to apply for training and employment opportunities with the company. Wherever possible, special training will be provided for such groups to prepare them to compete on genuinely equal terms for jobs and promotion. However, actual recruitment to all jobs will be strictly on merit.

Wherever possible, efforts will be made to identify and remove unnecessary/unjustifiable barriers and provide appropriate facilities and conditions of service to meet the special needs of disadvantaged and/or underrepresented groups.

## Personnel Records

In order to ensure the effective operation of the equal opportunity policy (and for no other purpose) a record will be kept of all employees' and job applicants' gender, racial origins and disability.

Where necessary, employees will be able to check/correct their own record of these details. Otherwise, access to this information will be strictly restricted. Such records will be analysed regularly, and appropriate follow-up action taken.

The co-operation of all employees is essential for the success of this policy. However, ultimate responsibility for achieving the policy's objectives, and for ensuring compliance with the relevant Acts of Parliament as well as the various Codes of Practice, lies with the company. Behaviour or actions against the spirit and/or the letter of the laws on which this policy is based will be considered serious disciplinary matters, and may, in some cases, lead to dismissal

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**Paul Cockle**  
Managing Director  
January, 2018

# ENVIRONMENTAL POLICY STATEMENT



## Mission

Our aim is to protect the environment from harm and degradation arising from our activities, products and services.

## Statement

We recognise our responsibilities to our staff, our customers, the communities in which we operate and the wider environment.

We are committed to comply with all relevant environmental legislation at local, regional and national level, as a minimum performance, to meet and exceed industry best practice and to continually improve environmental performance through appropriate initiatives, controls, provision of resources and training of employees.

An Environmental Management System (EMS) has been established that complies with the International Standard ISO 14001 : 2015. This integrates environmental understanding and control into other systems and procedures, under the direction of the top management team and with the support of all employees, suppliers and contractors.

Management objectives and targets are established and reviewed on a regular basis to implement the Environmental Policy. These are based on our specific commitment to seven environmental principles:

- Prevention of pollution
- Minimise waste in all its forms and make efficient use of all materials, energy and other resources
- Effective and responsible waste management and disposal
- Promoting product reuse and recycling
- Maintaining high workforce awareness of environmental issues
- Involving suppliers, contractors and customers in environmental initiatives
- Communicate with local communities to ensure our work causes the minimum disturbance and disruption

The EMS's effectiveness is monitored and maintained by regular audit and Management Review.

This Environmental Policy is communicated to all employees and made available to the public on our website.

The involvement of our workforce and external interested and affected parties in our Environmental Policy is encouraged through effective communication procedures.

This system is integral to the management of our business.

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Paul Cockle  
Managing Director  
March 2018

# EMPLOYMENT AND MODERN SLAVERY POLICY



## Mission

Bridford Interiors is fully committed to its employees and to promoting mutual respect, trust and integrity. We believe each employee is entitled to fair, courteous and dignified treatment during the hiring process, while employed and at the end of employment. We recognise that employee development and welfare is vital to the success of our company.

We are committed to combatting slavery and human trafficking within our organisation, our supply chain and wider construction industry.

## Statement

Our policy seeks to ensure:

- Selection is strictly on merit without any consideration for cast, creed, gender, religion, race, colour, provincial or national origin, disability, sexual orientation, political opinion or other similar factors.
- Child labour is not allowed and appropriate safeguards are in place for young workers.
- Working hours and other service conditions are designed for better health, environment and social conditions of employees and are in accordance with the prevailing applicable laws of the country.
- Human resources development through further education and training is encouraged.
- Workers are free to leave at any time.
- Any kind of deposit will not be taken for employment.
- Forced, prison or bonded labour will not be employed.

Age and eligibility:

- In no circumstances will any person below 18 years of age be employed in hazardous activity.
- In no circumstances will any person below the age of 15 be employed.
- Young workers (15-17) shall only be employed in non-hazardous activities, and appropriate safeguards for their health, safety, development and education shall be in place.
- An employee's age shall be verified from one of the following:
  - a) Birth certificate.
  - b) Driving Licence.
  - c) Passport.
  - d) National Insurance Certificate

Our projects are spread throughout the UK and are often of short duration. Where possible and if there are no specific qualifications, accreditations, time restraints or client requirements to be met we try and recruit and procure services locally.

Operationally, this policy is to be effected by ensuring:

- managers maintain open and frank communication with employees;
- directors promote a culture that does not lend itself to cultivation of disputes;
- site amenities are adequate and site safety is constantly monitored and reported upon.

The co-operation of all employees is essential for the success of this policy. However, ultimate responsibility for achieving the policy's objectives, and for ensuring compliance with the relevant Acts of Parliament as well as the various Codes of Practice, lies with the company. Behaviour or actions against the spirit and/or the letter of the laws on which this policy is based will be considered serious disciplinary matters, and may, in some cases, lead to dismissal.



**Paul Cockle**  
Managing Director  
January 2018

# CORPORATE AND SOCIAL RESPONSIBILITY POLICY



## Mission

Bridgford Interiors Ltd have identified that working in a professional manner is integral to the success of the business consequently we aspire to manage our social, ethical and environmental responsibilities by upholding the following principles:

- To treat employees fairly and equitably
- To operate ethically and with integrity
- To respect basic human rights
- To sustain the environment for the future
- To be a caring neighbour in our communities

## Statements

- **Clients:** We will serve our clients with honesty integrity and professionalism and provide our services with care, skill, competence and diligence consistent with their best interests.
- **Standards of Practice:** We will provide our services in a manner consistent with the established and accepted standards of the profession and with the laws and regulations which govern its practise. We will avoid conduct that would be considered unethical.
- **Competition:** We will maintain our professional reputation by competing fairly with our competitors at all times”
- **Remuneration:** We will negotiate fairly and openly with clients in establishing a basis for compensation. We will charge fees and expenses that are commensurate with the services to be provided and the responsibilities and risks to be assumed. We will remunerate our staff fairly.
- **Public Welfare:** Midas will not tolerate racial, sexual or political discrimination. We will hold the health, safety and welfare of our staff and the public in the highest regard and will seek ways to continuously improve our performance in this arena.
- **Internal Support:** We will conduct ourselves in the interests of our clients, staff and the wider community. We will actively promote honest and ethical behaviour and will support and protect anyone who ‘whistle-blows’ within the business where illegal or unethical conduct is concerned.

## To achieve this, we will commit to:

**The Community** - We will continue to support the communities in which we work and seek to behave with integrity through engaging in consultation and contributing to the economic and social well-being of that area

- Participation in community projects
- Supporting local businesses, charities and the economies in which we work
- Operating in a way which does not affect the safety of those around us
- Working in Partnership with councils, planning authorities and regulatory bodies
- Respecting the diversity of communities in which we operate and being sensitive to local needs

**The Workplace** – The safety of our employees, contractors and visitors is a top priority in all of our workplaces. We will respect their views, provide a safe and healthy working environment and conduct business with integrity.

- By carrying out risk assessments to identify potential hazards, we aim to prevent accidents and injury from occurring.
- We will also strive to ensure compliance with legislation, be a good and ethical employer, attracting and retaining the best employees.
- It is the skills, knowledge and motivation of our people that creates the unique atmosphere and generates the business success that makes Bridgford Interiors Ltd such a great place to work.
- We will maintain a strong training and development programme for all employees, including CSCS accreditation and SMSTS Safety training for all site based management.
- Through our Health & safety Department we will ensure safe sites for all employees and suppliers, including targets for improvement of occurrences of RIDDOR and minor injuries.
- Investing and developing the skills and capabilities of the workforce through the Midas Academy and other mechanisms
- Understand the needs of our people by consulting regularly and acting on what we hear
- Remunerating our employees fairly
- Valuing the diversity of our people
- Complying with all relevant employment and Health & Safety Standards

**The Environment** – we take environmental issues seriously and have been addressing the impact of construction operations on the environment, and developing techniques to minimise their impacts. We will seek to minimise the environmental impacts of our activities on the surrounding environment and communities, minimise pollution and develop intelligent solutions to ensure continuous improvement in our environmental performance

- Fully committing to sustainable development and our Environmental Policy
- Complying with further relevant environmental legislation and standards
- Encouraging the efficient use of resources and reduce emission of carbon dioxide wherever we can
- Seeking alternative solutions which encourage sustainable construction and more efficient waste management

**The Marketplace** – Consider the impact of the goods and services the company purchases and produces on the marketplace and ensure that our business is seen as having a high standard of behavior. We will conduct all aspects of our business to a high ethical standard, demonstrating honesty and integrity as well as complying with applicable laws and regulations. We will communicate as well as demonstrate to our customers and suppliers, our commitment to the principles of corporate social, ethical and environmental issues.

We will listen to the views of our customers, exceed expectations and respond to market requirements and competitive pressures:

- Exceeding our customers' expectations and meeting the challenges placed on us to deliver against contracts
- Placing safety & sustainability at the heart of our business and customer objectives
- Respecting diversity and considering the needs of users with special needs
- Forging long term and mutually beneficial relationships with our customers
- Establishing a delivery model which integrates design, procurement and construction effectively

We will work as an integrated team with our supply chain to provide safe and healthy working environments and pursue best practice:

- Providing safe and healthy working conditions for everyone working with us
- Working in partnership with our suppliers to ensure we are at the leading edge of construction techniques and products
- Seeking the views of suppliers and acting on what we hear
- Engaging our suppliers in our standards and policies
- Managing our supply chain better to increase efficiencies, reduce waste and enhance profitability



**Paul Cockle**  
Managing Director  
January, 2018

# DRUG AND ALCOHOL POLICY



This statement sets out the Bridgford Interiors policy in respect of any employee/sub-contractor whose proper performance of their duties is or may be impaired as a result of drinking alcohol or taking drugs. It is supported by various Clients requirements on this subject and their standards for working on their properties during construction activities.

All persons concerned are to be made aware of this statement and become familiar with its contents.

## Policy

Bridgford Interiors will take all reasonable steps to ensure that employees or Sub-contractors are made aware of the contents of this statement together with the relevant Client standards and requirements.

It is a requirement of Bridgford Interiors that no employee or Sub-contractor shall:

- report or endeavour to report for duty, having just consumed alcohol or being under the influence of drugs
- report for duty in an unfit state due to the use of alcohol or drugs
- be in possession of drugs of abuse in the work place
- consume alcohol or drugs whilst on duty

Bridgford Interiors will not tolerate any departure from these rules and will take the appropriate disciplinary action in the event of any infringement.

## Application

This policy will apply equally to staff employed directly by Bridgford Interiors and any subcontractors employed, for the duration of any contract working on Bridgford Interiors controlled sites

Screening for the presence of drugs and alcohol may take place based upon company discretion. This includes procedures to:

- detect the use of alcohol and/or drugs by any person(s) involved in a safety critical incident
- where there are grounds to suspect that the actions or omissions of the person(s) led to the incident
- detect the use of alcohol and or drugs where abnormalities of behaviour prompt managerial intervention (which may include a request for screening)

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**Paul Cockle**  
Managing Director  
January, 2018

# DATA PROTECTION POLICY



## 1. Introduction

This Policy sets out the obligations of Bridgford Interiors Ltd (“the Company”) and the procedures to be adhered to relating to data protection, privacy and the rights of its customers, business contacts and third-party suppliers (“data subjects”) in respect of their personal data under the General Data Protection Regulation (“the Regulation”), which will come into force on 25<sup>th</sup> May 2018. In anticipation, the Company have conducted a review of its current arrangements.

The procedures in this document, together with any lawful instructions of the board, must be followed at all times by the Company, its employees, agents, contractors or other parties working on behalf of the Company.

The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

## 2. The Data Protection Principles

This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- b) collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 3. Lawful, Fair, and Transparent Data Processing

The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary to protect the vital interests of the data subject or of another natural person;

- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

#### 4. **Processed for Specified, Explicit and Legitimate Purposes**

The Company collects and processes the personal data set out in Part 21 of this Policy. This may include personal data received directly from data subjects (for example, contact details used when a data subject communicates with us) and data received from third parties (for example, names, addresses and telephone numbers of customers, and suppliers).

The Company only processes personal data for the specific purposes set out in Part 21 of this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be informed to data subjects at the time that their personal data is collected, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

#### 5. **Adequate, Relevant and Limited Data Processing**

The Company will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under Part 4, above.

#### 6. **Accuracy of Data and Keeping Data Up To Date**

The Company shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

#### 7. **Timely Processing**

The Company shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

The Company collects personal data to perform contracts with third parties (e.g. customers, contractors, sub-contractors and suppliers), to comply with HMRC and insurance requirements, employment legislation and for marketing purposes in the case of prospective customers.

#### 8. **Secure Processing**

The Company shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in Parts 22 and 23 of this Policy.

#### 9. **Accountability**

The Company's data protection officer is Neil Harrison.

The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

- a) The name and details of the Company, its data protection officer, and any applicable third party data controllers;
- b) The purposes for which the Company processes personal data;
- c) Details of the categories of personal data collected, held, and processed by the Company; and the

categories of data subject to which that personal data relates;

- d) Details (and categories) of any third parties that will receive personal data from the Company;
- e) Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
- f) Details of how long personal data will be retained by the Company (which will vary depending upon the type and category of data); and
- g) Detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data.

## 10. **Privacy Impact Assessments**

The Company shall carry out Privacy Impact Assessments when and as required under the Regulation. Privacy Impact Assessments shall be overseen by the Company's data protection officer and shall address the following areas of importance:

- a) The purpose(s) for which personal data is being processed and the processing operations to be carried out on that data;
- b) Details of the legitimate interests being pursued by the Company;
- c) An assessment of the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
- d) An assessment of the risks posed to individual data subjects; and
- e) Details of the measures in place to minimise and handle risks including safeguards, data security, and other measures and mechanisms to ensure the protection of personal data, sufficient to demonstrate compliance with the Regulation.

## 11. **The Rights of Data Subjects**

The Regulation sets out the following rights applicable to data subjects:

- a) The right to be informed;
- b) The right of access;
- c) The right to rectification;
- d) The right to erasure (also known as the 'right to be forgotten');
- e) The right to restrict processing;
- f) The right to data portability;
- g) The right to object;
- h) Rights with respect to automated decision-making and profiling.

## 12. **Keeping Data Subjects Informed**

12.1 The Company shall ensure that the following information is provided to every data subject when personal data is collected:

- a) Details of the Company including, but not limited to, the identity of its Data Protection Officer;
- b) The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 21 of this Policy) and the legal basis justifying that collection and processing;
- c) Where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data;
- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- e) Where the personal data is to be transferred to one or more third parties, details of those parties;

- f) Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the “EEA”), details of that transfer, including but not limited to the safeguards in place (see Part 24 of this Policy for further details concerning such third country data transfers);
- g) Details of the length of time the personal data will be held by the Company (or, where there is no predetermined period, details of how that length of time will be determined);
- h) Details of the data subject’s rights under the Regulation;
- i) Details of the data subject’s right to withdraw their consent to the Company’s processing of their personal data at any time;
- j) Details of the data subject’s right to complain to the Information Commissioner’s Office (the ‘supervisory authority’ under the Regulation);
- k) Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it;
- l) Details of any automated decision-making that will take place using the personal data (including but not limited to profiling), including information on how decisions will be made, the significance of those decisions and any consequences.

12.2 The information set out above in Part 12.1 shall be provided to the data subject at the following applicable time:

12.2.1 Where the personal data is obtained from the data subject directly, at the time of collection;

12.2.2 Where the personal data is not obtained from the data subject directly (i.e. from another party):

- a) If the personal data is used to communicate with the data subject, at the time of the first communication; or
- b) If the personal data is to be disclosed to another party, before the personal data is disclosed; or
- c) In any event, not more than one month after the time at which the Company obtains the personal data.

### 13. **Data Subject Access**

13.1 A data subject may make a subject access request (“SAR”) at any time to find out more about the personal data which the Company holds about them. The Company is normally required to respond to SARs within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

13.2 All subject access requests received must be forwarded to Neil Harrison, the Company’s data protection officer. His contact details are: [neil.harrison@bridgford.co.uk](mailto:neil.harrison@bridgford.co.uk). If the Data Protection Officer receives a request under the GPR it will log it on its GDPR Data Subject Access Request register. It will acknowledge the request by emailing the Data Subject back within 48 hours.

13.3 The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

### 14. **Rectification of Personal Data**

14.1 If a data subject informs the Company that personal data held by the Company is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject’s notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

14.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

## 15. Erasure of Personal Data

- 15.1 Data subjects may request that the Company erases the personal data it holds about them in the following circumstances:
- a) It is no longer necessary for the Company to hold that personal data with respect to the purpose for which it was originally collected or processed;
  - b) The data subject wishes to withdraw their consent to the Company holding and processing their personal data;
  - c) The data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so) (see Part 18 of this Policy for further details concerning data subjects' rights to object);
  - d) The personal data has been processed unlawfully;
  - e) The personal data needs to be erased in order for the Company to comply with a particular legal obligation.
- 15.2 Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).
- 15.3 In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

## 16. Restriction of Personal Data Processing

- 16.1 Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.
- 16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

## 17. Data Portability

- 17.1 The Company processes personal data using automated means for making payments to suppliers and receiving receipt from customers in the normal course of its business.
- 17.2 Where data subjects have given their consent to the Company to process their personal data in such a manner or the processing is otherwise required for the performance of a contract between the Company and the data subject, data subjects have the legal right under the Regulation to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers, e.g. other organisations).
- 17.3 To facilitate the right of data portability, the Company shall make available all applicable personal data to data subjects in the following formats: Excel, Word or attachments to emails.
- 17.4 Where technically feasible, if requested by a data subject, personal data shall be sent directly to another data controller.
- 17.5 All requests for copies of personal data shall be complied with within one month of the data subject's request (this may be extended by up to two months in the case of complex requests in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

## 18. **Objections to Personal Data Processing**

- 18.1 Data subjects have the right to object to the Company processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling).
- 18.2 Where a data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing forthwith, unless it can be demonstrated that the Company's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.
- 18.3 Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing forthwith.

## 19. **Automated Decision-Making**

- 19.1 In the event that the Company uses personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on data subjects, data subjects have the right to challenge to such decisions under the Regulation, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from the Company.
- 19.2 The right described in Part 19.1 does not apply in the following circumstances:
  - a) The decision is necessary for the entry into, or performance of, a contract between the Company and the data subject;
  - b) The decision is authorised by law; or
  - c) The data subject has given their explicit consent.

## 20. **Profiling**

Where the Company uses personal data for profiling purposes, the following shall apply:

- a) Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b) Appropriate mathematical or statistical procedures will be used;
- c) Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d) All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 22 and 23 of this Policy for more details on data security).

## 21. **Personal Data**

The following personal data may be collected, held, and processed by the Company:

- a) Name, address, telephone number, email, bank details including account number, sort code, iban and bank addresses, fax number, VAT number and CRN;
- b) Names, addresses, dates of birth, national insurance numbers, tax codes, payroll deduction instructions, bank sort code, bank account numbers, bank addresses, contracts of employments, passport, driving licence, GP details, email emergency contact information, private car details, medical certificates, maternity certificates and medical records (where appropriate) of employees;
- c) Cookie data to enable the Company's website to work and to track customer behaviour;
- d) Tracking data for emails to provide services.

## 22. **Data Protection Measures**

The Company shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with or be made aware of the following when working with personal data:

- a) The Company's servers are on site, supported by Total IT. The Company has various security measures in place including a hardware-based firewall – Draytek Router which filters traffic and unwanted connections. It also has anti-virus software.
- b) The Company uses Office365 for its email. Such emails are subject to the security measures put in place by Windows from time to time.
- c) The Company will process and store data for the performance of its contracts. Once the contract has been completed, the Company will only process and store for marketing purposes (subject to the consent of the Data Subject) or where the Company is obliged to retain personal data to fulfil a regulatory, statutory obligation, to comply with its insurers requirements, or where it is in the Company's legitimate interests to do so. Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded, and electronic copies should be deleted securely using the delete facility of the programme on which the data is retained;
- d) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- e) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- f) Personal data contained in the body of an email will be stored appropriately or deleted once the purpose has been fulfilled. All temporary files associated therewith should also be deleted;
- g) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient;
- h) No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested from Neil Harrison;
- i) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar. Rooms where Personal Data are stored should be fitted with a keypad or rooms will be locked where feasible to restrict access to the data;
- j) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without the authorisation of the Data Protection Officer;
- k) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time;
- l) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- m) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to the Company or otherwise without the formal written approval of the Data Protection Officer, and in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is necessary;
- n) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken);
- o) All data stored electronically by the Company is backed up on a server to server basis by Total IT;
- p) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols;
- q) Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. [IT staff do not have access to passwords];

- r) Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the Data Protection Officer to ensure that the data subjects have given their consent.

## 23. Organisational Measures

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- a) All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;
- b) Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
- c) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- d) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;
- e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;
- f) The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- g) All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;
- h) All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Company arising out of this Policy and the Regulation;
- i) Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

## 24. Transferring Personal Data to a Country Outside the EEA

24.1 The Company does not currently transfer data outside the EEA but it may from time do so. "Transfer" in this context includes making available remotely personal data to countries outside of the EEA.

24.2 The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:

- a) The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
- b) The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the Regulation); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;
- c) The transfer is made with the informed consent of the relevant data subject(s);
- d) The transfer is necessary for the performance of a contract between the data subject and the Company (or for pre-contractual steps taken at the request of the data subject);

- e) The transfer is necessary for important public interest reasons;
- f) The transfer is necessary for the conduct of legal claims;
- g) The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or
- h) The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

## 25. Data Breach Notification

- 25.1 All personal data breaches must be reported immediately to the Company's Data Protection Officer.
- 25.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the data protection officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within **72 hours** after having become aware of it.
- 25.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 25.2) to the rights and freedoms of data subjects, the data protection officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.
- 25.4 Data breach notifications shall include the following information:
  - a) The categories and approximate number of data subjects concerned;
  - b) The categories and approximate number of personal data records concerned;
  - c) The name and contact details of the Company's data protection officer (or other contact point where more information can be obtained);
  - d) The likely consequences of the breach;
  - e) Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

## 26. Implementation of Policy

This Policy shall be deemed effective as of 23 May 2018. No part of this Policy shall have retrospective effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

**Name:** Neil Harrison  
**Position:** Finance Director  
**Date:** 23<sup>rd</sup> May 2018  
**Due for Review by:** TBA  
**Signature:**