

TRAD GROUP POLICY
DATA PROCESSING POLICY

01	06-Nov-18	Revised to include TRAD Group Entities at the start of the Statement.
00	25-May-18	First issue (amalgamation of TRAD Sister Companies' existing Policies into a Group Policy)
REV	DATE	STATUS / DESCRIPTION OF CHANGES

DOCUMENT NO.	TRAD-POL- 006
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STATEMENT

Under the General Data Protection Regulations (GDPR), the data protection principles set out the main responsibilities for organizations.

Note: This Group Policy is applicable to every company within the TRAD Group: TRAD Scaffolding Contractors, TRAD Hire & Sales Ltd, and TRAD Safety Systems Ltd and all companies will ensure full compliance.¹

GDPR requires that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- Personal data to be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- Personal data shall be 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

This document will give you some useful information about the type of information that TRAD Group does keep about you and the purposes for which it keeps them.

Throughout your employment and for as long a period as is necessary following the termination of your employment, the Company will need to keep information about you for purposes connected with your employment, including your recruitment and the termination of your employment.

The records may include: information gathered from you and any references obtained during your recruitment; details of your terms of employment; payroll, tax and national insurance information; information about your performance; details of your grade and job duties; health records; absence records including holiday records and self-certification forms; details of any disciplinary investigations and proceedings; training records; contact names and addresses; correspondence with the Company and other information that you have given to the Company.

We believe these uses are consistent with our employment relationship and with the principles of GDPR. The information we hold will be for our management and administrative use only but we may, from time to time, need to disclose some information we hold about you to relevant third parties (e.g. where legally obliged to do so by the Inland Revenue or where requested to do so by you for the purposes of giving a reference). We may also transfer information about you to another group company/group head office solely for purposes connected with your career or the management of TRAD Group's business.

You should always be aware that the Company may hold the following information about you, for which disclosure to any person will only be made when strictly necessary for the purposes set out below:

- Your health for the purposes of compliance with our health and safety and occupational health obligations; for the purposes of HR management and administration, for example, to consider how your health affects your ability to do your job and, if you are disabled, whether you require any reasonable adjustments to be made to assist you at work; and the administration of insurance, pension and sick pay.

- In connection with unspent convictions to enable us to assess your suitability for employment.
- We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- We may disclose your personal data to our clients, as reasonably necessary in relation to our obligation in fulfilling a contract thus allowing our clients to undertake audits when necessary. Wherever possible we will always endeavour to anonymise your data.
- Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.
- In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

Declaration

The TRAD Group is fully committed to ensuring compliance both with the letter and spirit of the principles of this Policy. For that reason, the directors named below have been appointed with the responsibility and authority to oversee and drive compliance. The policy will be reviewed annually and the Policy will be disseminated throughout the Group as required.


For and on behalf of the TRAD Group

Des Moore, TRAD Group CEO



Dated: as front page

John Patterson, TRAD Hire & Sales, Managing Director



Dated: as front page

Jim Gorman, TRAD Safety Systems, Managing Director



Dated: as front page

Neil Garner, TRAD Scaffolding Contractors, Managing Director¹



Dated: as front page

¹ Please note that TRAD Scaffolding Contractors is a brand name for TRAD Scaffolding Co Limited.