



05 Data Protection Policy 24-25

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				DATE:	04/12/2024
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				APPROVED BY:	Dan Elwell



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Rapidfix Ceilings & Partitions Ltd
Data Protection Policy
24/25

Introduction

This Policy sets out the obligations of, **Rapidfix Ceilings and Partitions Ltd** registered in United Kingdom under number **09866962**, whose registered office is at **8 Castlegate, Tickhill, Doncaster, England, DN11 9QU** regarding data protection and the rights of **Employees and customers** in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

GDPR 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.

This Policy sets **Rapidfix Ceilings and Partitions Ltd** obligations regarding the collection, processing, transfer, storage, and disposal of personal data.

The procedures and principles set out herein must always be followed by **Rapidfix Ceilings and Partitions Ltd**, its employees, agents, contractors, or other parties working on behalf of **Rapidfix Ceilings and Partitions Ltd**.

The **Rapidfix Ceilings and Partitions Ltd** is committed not only to current and amended legislation , but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

Rapidfix Ceilings and Partitions Ltd shall always look at systems that will protect personnel and individuals and data that is collected or recorded. As an organisation our intention is to be fully transparent in what we do as a business, and this includes all personal data.

We generally have limited access in place to information on our systems in order to limit the potential of data breaches or individuals’ personal data being accessible, seen or used by others.

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1. Personal Data Collected, Held, and Processed

The following personal data is collected, held, and processed by **Rapidfix Ceilings and Partitions Ltd**

Data Ref.	Type of Data	Purpose of Data
Personnel	Training and contact information	To define personnel and sub-contractors required for successfully tendered contracts.
Induction Forms PQQ	2-page form giving info of the person	<p>To ensure that the basic information where required can be elaborated on to gain information that will be required to be secured by the Data Protection Officers within an electronic system that is password protected.</p> <p>These are now generally recorded on Paperless systems which are locked to certain personnel only. They are generally project specific and allow the users to enter and protect their own information via the Paperless Construction App that they can get access to.</p> <p>RCP Ltd only use PQQ and induction data to assists with planning projects and ensuring that personnel have the right credentials and skill sets to undertake works on our sites.</p>
New Starter Forms	Contact / Financial / NI / UTR / Next of Kin Details / Passport Details - To verify identity, for taxation, right to work status, payments, and emergency contact details	<p>To validate that the personnel are who they say they are for Sub-Contractor supply chain due diligence purposes. This information shall be secured by the Data Protection Officers.</p> <p>It shall also be a demonstration that there are no issues regarding any legal right to work in the UK.</p> <p>This to protect workers and also to prevent modern slavery.</p>
Sub-Contractor Reviews	Electronic review of expected works and current progress	<p>Within the review there will be questions to the Limited Company Director relating to modern Slavery and Exploitation. This is just an indicative ongoing review. The review are password encrypted on the cloud-based server.</p> <p>These reviews will be ongoing for sub-contractors that are Ltd companies with 5 or more employees.</p>

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Data Ref.	Type of Data	Purpose of Data
<<insert ref>>	<<insert data type>>	<<describe purpose of data>>

2. Data Security - Transferring Personal Data and Communications

Rapidfix Ceilings and Partitions Ltd shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

All emails containing personal data shall be encrypted where necessary.

All emails containing personal data must be marked “**confidential**”;

Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances; RCP Ltd use an external IT systems that has security systems enabled to reduce the potential of others accessing the system or via threats from phishing and other scams.

Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;

Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted.

Where personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;

Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient and;

All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked “confidential”.

3. General

Rapidfix Ceilings and Partitions Ltd respects the privacy of its entire staff and of all individuals, and strictly adheres to the Data Protection Act 1998 (‘DPA’).

The DPA requires that the ‘personal data’ of living individuals that is kept by RCP Ltd on computer or well-structured paper files must be processed in accordance as follows.

Personal data:

- Must be processed fairly and lawfully at all times with transparency.
- Will only be obtained for specific and lawful purposes and not processed in any other way

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- Is relevant, adequate, and not excessive.
- Must not be kept for longer than absolutely necessary.
- Shall be kept in a secure manner to prevent loss, destruction, or unauthorised disclosure of that data.
- Is accurate and where necessary kept up to date.
- Is processed in accordance with the rights of data subjects under the act.

‘Personal data’ is broadly defined as data from which a living individual can be identified from either that data alone, or with other information, which is in the possession of, or is likely to come into the possession of, the data controller.

Sensitive personal data is identified as information relating to:

- Racial or ethnic origin
- Political opinion
- Religious or other beliefs
- Trade Union Membership
- Physical or mental health or condition
- Sexual life
- Criminal proceedings or Convictions

‘Individuals’ could be any living persons – for example, employees, agency staff, customers, contractors, suppliers and job applicants.

‘Processing’ includes obtaining, recording, holding, using, disclosing, or deleting any personal data. For clarification, any activity involving personal data will likely fall within the scope of the DPA.

Rapidfix Ceilings and Partitions Ltd will, through appropriate management and the use of strict criteria and control measures:

- Ensure there is someone specifically responsible for data protection within the organisation, known as the Data Protection Officer (‘DPO’), whose role it is to manage compliance for **Rapidfix Ceilings and Partitions Ltd**.
- Ensure all staff take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss by way of the following:
- Paper files and other records or documents containing sensitive data are to be kept in a secure manner and not disclosed without compliance with the DPA.

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- Any personal data held on computers and/or computer systems is to be protected by the use of secure passwords and controlled to a minimum number of personnel.
- Any individual passwords should be such that they are not easily compromised for access to personal data.
- Establish a process by which any data security breach (e.g. loss of personal data) is immediately reported to the DPO, and all staff must co-operate fully with any investigation and management of any such breach.
- Ensure personal data is processed in accordance with [Sensitive Personal Data Types](#) included in this policy above.
- Ensure that all contractors, consultants, partners or agents of the company and are aware of this policy as required.
- **Rapidfix Ceilings and Partitions Ltd** shall as required enter into a written contract with any third party that requires the third party to act only on instruction from **Rapidfix Ceilings and Partitions Ltd** and to comply with obligations equivalent to this policy.
- Any breach of any provision of the DPA will be deemed as being in breach of the contract between **Rapidfix Ceilings and Partitions Ltd** and the individual, company, partner, firm or other.

Rapidfix Ceilings and Partitions Ltd regards the lawful and correct treatment of personal information as critical to its operations and to maintaining confidence among its staff and affiliates.

4. This policy has been approved & authorised by:

Signed	
Name:	Dan Elwell
Position:	Commercial Director
Review Date:	04/12/2024
Next Review	04/12/2025

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Rapidfix Ceilings and Partitions Ltd

Subject Access Request Form



5. APPENDIX 1 -SARs Form

Important Information

Rapidfix Ceilings and Partitions Ltd collects, holds, and processes certain personal data about our **Sub-contractors**. As a data subject, you have a legal right, under UK Data Protection Legislation (including the UK GDPR and any successor legislation) to find out about our use of your personal data as follows:

- Confirmation that your personal data is being processed by us;
- Access to your personal data;
- How we use your personal data and why;
- Details of any sharing or transfers of your personal data;
- How long we hold your personal data;
- Details of your rights under UK Data Protection Legislation including, but not limited to, your rights to withdraw your consent to our use of your personal data at any time and/or to object to our processing of it.

No fee is payable under normal circumstances. We reserve the right to charge a reasonable fee for requests that are manifestly unfounded, excessive, or repetitive.

Please complete the required information overleaf and return it to us addressed to: **dan@rapidfixltd.net (Data Protection Officer)** You do not have to use this form and may instead write to us

After receiving your **subject access request**, we may contact you to request additional supporting information and/or proof of your identity. This helps us to safeguard your privacy and personal data.

We will respond to all subject access requests within one month of receipt and will aim to provide all required information to you within the same period. If we require further proof of ID, or if your request is unusually complicated, we may require more time and will inform you accordingly.

If you are making a subject access request on someone else's behalf, please contact **dan@rapidfixltd.net (Data Protection Officer)**

Your Details

Title:	
Forename(s):	
Surname:	
Address:	
Telephone Number:	
Email Address:	

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Rapidfix Ceilings and Partitions Ltd

Subject Access Request Form



- Information Being Requested
- Please provide specific details (along with any relevant dates) of the information being requested and any additional information that may help us to locate your personal data and to confirm your identity.
- By completing this form, you are making a subject access request under UK Data Protection Legislation for personal data collected, processed, and held about you by us that you are entitled to receive.

Declaration

By signing below, **you confirm that you are the data subject named in this Subject Access Request Form**. You warrant that you are the individual named and will fully indemnify **Rapidfix Ceilings and Partitions Ltd** for all losses and expenses incurred if you are not. We cannot accept requests in respect of your personal data from anyone else, including members of your family.

Name:	
Signature:	
Date:	

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