

## DATA PRIVACY POLICY & NOTICE

1. **Introduction.** Personal data is protected by law. Jones Bros Ruthin Co Ltd<sup>1</sup> is committed to protecting your personal information. This privacy notice will inform you as to how we look after your personal information, when you visit our website and what you can expect us to do when we collect personal information. It also will tell you about your privacy rights and how the General Data Protection Regulations (GDPR) protects you. Data Protection laws state that companies and organisations can use personal information **only** if they have a proper reason to do so and with consent from the individual. This privacy policy document is written to inform you the client, suppliers, subcontractors, potential new, existing and previously employed staff about:
  - a. [What and why we collect personal information.](#)
  - b. [Where and how we collect personal information.](#)
  - c. [How long we keep your personal information.](#)
  - d. [CCTV Images.](#)
  - e. [How you can obtain a record of what information/data Jones Bros holds against your name or company.](#)
  - f. [What to do if you want us to stop using your personal information?](#)
  - g. [How to withdraw your consent.](#)
  - h. [Job applicants.](#)
  - i. [Personal Data Breaches](#)
  - j. [How to contact us.](#)
  - k. [Cookies.](#)
  
2. **What and why we collect personal information.** Jones Bros Ruthin Co Ltd collects and processes personal data only when absolutely necessary and only to fulfil the following requirements.
  - a. To fulfil a contract, we have with our clients, suppliers, subcontractors, potential new and existing Jones Bros Ruthin Co Ltd staff and any other interested parties.
  - b. When it is our legal duty.
  - c. When it is in our legitimate interest.
  - d. Only when you consent to Jones Bros Ruthin Co Ltd collecting the data.

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<sup>1</sup> Jones Bros Ruthin Co Ltd is the Holding Company with Jones Bros Ruthin (Civil Engineering) Co Ltd & Cambrian Services Limited as subsidiaries

3. The table below shows what we use personal information for and the reason we do so. The table also shows what Jones Bros Ruthin Co Ltd legitimate interests are for collecting the personal data.

<b>What we use your personal information for</b>	<b>Our reasons</b>	<b>Our legitimate interests</b>
<ul style="list-style-type: none"> <li>To manage our relationship with our clients, suppliers, subcontractors and any other interested parties.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> <li>With your consent.</li> </ul>	<ul style="list-style-type: none"> <li>Keeping our records up to date.</li> <li>Working out which of our construction services may interest you and telling you about them.</li> <li>Developing construction services, and what we charge for them.</li> <li>Defining types of customers for new construction services.</li> <li>Seeking your consent when we need it to contact you.</li> <li>Being efficient about how we fulfil our legal duties.</li> </ul>
<ul style="list-style-type: none"> <li>To provide advice or guidance about our construction services.</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests.</li> <li>With your consent.</li> </ul>	<ul style="list-style-type: none"> <li>Developing construction services, and what we charge for them.</li> <li>Working out which of our services may interest you and telling you about them.</li> </ul>
<ul style="list-style-type: none"> <li>To develop and carry out external communications with potential clients, current clients, subcontractors and suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests.</li> <li>With your consent.</li> </ul>	<ul style="list-style-type: none"> <li>Developing construction services, and what we charge for them.</li> <li>Working out which of our construction services may interest you and telling you about them.</li> <li>To win new clients</li> </ul>
<ul style="list-style-type: none"> <li>To develop new ways to meet our clients' needs and to grow our business.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>With your consent.</li> </ul>	<ul style="list-style-type: none"> <li>Developing construction services, and what we charge for them.</li> <li>Working out which of our construction services may interest you and telling you about them.</li> <li>To win new clients</li> </ul>
<ul style="list-style-type: none"> <li>To manage our relationship with all Jones Bros Ruthin Co Ltd staff.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> <li>With your consent.</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient about how we fulfil our legal and contractual duties.</li> <li>Complying with regulations that apply to us.</li> <li>Developing company staff and improving the construction services Jones Bros Ruthin Co Ltd provides to clients.</li> </ul>
<ul style="list-style-type: none"> <li>To carry out staff recruitment.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> <li>With your consent.</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient about how we fulfil our legal and contractual duties.</li> <li>Complying with regulations that apply to us.</li> <li>Developing company staff and improving the construction services Jones Bros Ruthin Co Ltd provides to clients.</li> </ul>
<ul style="list-style-type: none"> <li>To manage how we work with other companies that provide services to us and our clients.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Developing construction services, and what we charge for them.</li> <li>Defining types of customers for new construction services.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To deliver our construction services and manage supplier, subcontractor payments.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Being efficient about how we fulfil our legal and contractual duties.</li> <li>Complying with regulations that apply to us.</li> </ul>
<ul style="list-style-type: none"> <li>To manage risk for us and our clients.</li> <li>To obey laws and regulations that applies to us.</li> <li>To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To run our business in an efficient and proper way. This includes managing our business capability, planning, communications, corporate governance, and audit.</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To exercise our rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> </ul>	<ul style="list-style-type: none"> <li>Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>

4. **Where and how we collect personal information.** Here is a list of all the ways that we collect and how we process your personal information.
- a. Data you give to us:
- (1) When you talk to us on the phone.
  - (2) Visit any of our offices or project sites. (Site Induction)
  - (3) When you provide a business card with company and work contact information.
  - (4) Information provided in contracts between client and Jones Bros Ruthin Co Ltd.
  - (5) **People who call head office.** When you call Jones Bros Ruthin Co Ltd we only collect the name e-mail and contact number of the caller to help us in responding to the call to ensure the call is answered promptly and to help Jones Bros improve its efficiency and effectiveness.
  - (6) Customers who visit our Cambrian Sites to purchase concrete or aggregates may be asked to complete a new client form and provide proof of identity. Your data will be processed by authorised Jones Bros Ruthin Co Ltd employees and stored securely with access control on the company document management system.
  - (7) **People who email us.** Jones Bros Ruthin Co Ltd uses Microsoft Office Outlook using Transport Layer Security (TLS) to encrypt and protect email traffic. Jones Bros monitors any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.
- b. Jones Bros Ruthin Co Ltd Third Party Data Processors and data storage:
- (1) **Social networks:** Jones Bros Ruthin Co Ltd uses the social media platforms [Facebook](#) & [Twitter](#) to provide updates on company news and advertise, highlight training and career opportunities at Jones Bros Ruthin Co Ltd. Our social media pages, such as Twitter and Facebook, are monitored by Jones Bros Ruthin Co Ltd selected staff and a third-party company. They pass any customer queries, questions or complaints onto the most appropriate person in our team, so that we can respond accordingly. Please click on the links to see the privacy policies set by Facebook and Twitter.
  - (2) **Website:** Our website is managed and monitored by a third-party company. They use Google Analytics to monitor the use of the website and to monitor the number visitors to the site. Google Analytics is a freemium web analytics service offered by Google that tracks and reports website traffic. When using the website a session cookie is generated, the purpose of which is so that word press knows it is the same user that is browsing the website as they click from one page to another. This session cookie disappears when the user closes their browser window. Please see the section on cookies below.
  - (3) **Construction Software Platform:** Jones Bros Ruthin Co Ltd uses a third party provider to store and manage data that we have collected from Jones Bros, clients, subcontractors and suppliers to help us to manage and deliver projects, accounts,

plant equipment and resources. The information entered into the third-party system is done so by Jones Bros Ruthin Co Ltd Data Processors. We have in place a written agreement with the third-party supplier confirming that all personal data entered has sufficient security, safeguards, and processes in place to protect all the data entered.

- (4) Jones Bros Ruthin Co Ltd uses a Short Message Service (SMS) text system to communicate with its employees. This is a third party service provider. The information entered into the third-party system is done so by Jones Bros Ruthin Co Ltd Data Processors. We have in place a written agreement with the third-party supplier confirming that all personal data entered has sufficient security, safeguards, and processes in place to protect all the data entered.
  - (5) **External Communication.** Jones Bros Ruthin Co Ltd does **not** carry out any direct marketing activities but does carry out external communication with support from a third party PR company to create content across a range of platforms that engages with industry decision makers and stakeholders, including potential Jones Bros Ruthin Co Ltd clients. The external communication includes:
    - (a) Communicating Jones Bros Ruthin Co Ltd significant experience and expertise in civil engineering.
    - (b) Preparing and sending press releases targeted at trade, business, and regional publications.
    - (c) Preparing information packs for trade exhibitions, recruiting events and opportunities.
  - (6) **Accredited Training Organisations and Colleges.** Jones Bros Ruthin Co Ltd is an accredited training provider requiring Jones Bros Ruthin Co Ltd to liaise and work with accredited training organisations and colleges for training assessments and the award of training qualifications to Jones Bros Ruthin Co Ltd employees.
  - (7) **HM Revenue & Customs (HMRC).** Jones Bros Ruthin Co Ltd provides all accounting and tax information to HMRC as required under UK legislation.
  - (8) **Disclosure and Barring Service (DBS).** Jones Bros Ruthin Co Ltd carries out recruitment events at schools and colleges and is therefore required by UK law to ensure all employees involved with these events have a DBS check carried out.
5. **How long we keep your personal information.** By law Jones Bros Ruthin Co Ltd must keep basic information about our, Staff, Suppliers, Subcontractors and Clients (including Contact, Identity, Financial and Transaction Data). Jones Bros Ruthin Co Ltd follows all legal and statutory requirements for the retention periods of personal data. To obtain a record of what information Jones Bros Ruthin Co Ltd holds about you or your companies please see and follow the directions below.
6. **CCTV Images.** Jones Bros Ruthin Co Ltd uses closed circuit television (CCTV) images to provide a safe and secure environment for employees and for visitors to the company's premises and to protect company property.
- a. The company's CCTV facility records images only. There is no audio recording. Images that are stored on media are erased or destroyed once the purpose of the recording is no longer

relevant. In normal circumstances, this will be a period of 31 days. Where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

- b. Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected. If you wish to obtain a copy of any images Jones Bros Ruthin Co Ltd may hold of you then please follow the instructions below for asking for information/data we may hold.
- c. **ADT - In-Cab Cameras and Trackers.** Jones Bros uses recording in-cab cameras and trackers in Articulated Dump Trucks (ADTs). This forms part of our health and safety arrangements and is intended to encourage safe operation by promoting the high levels of concentration and awareness required for operating such significant plant & equipment. It also deters careless operation and discourages possible distractions such as use of mobile phones whilst operating plant. The equipment consists of a two-way forward and driver facing camera with a microphone, and a vehicle tracker which continually provides location and speed data. The camera footage and sound recording is continuously recording but only reviewed by authorised management on a 'for cause' basis, e.g. after an incident or report of careless operation.

7. **How you can obtain a record of what information/data Jones Bros Ruthin Co Ltd holds against your name or company.** Jones Bros tries to be as open as it can be in terms of giving people access to their personal information. Individuals and companies can request information about themselves by contacting Jones Bros Ruthin Co Ltd HR by:

- a. E-mail [hrdept@jones-bros.com](mailto:hrdept@jones-bros.com)
- b. Telephone +44 01824 703661 ask to be connected to HR department.

Our normal working hours are:  
Monday-Friday 8:30am-5:30pm (GMT)

- c. Letter to:

HR Department, Head office  
Jones Bros Civil Engineering UK  
Ty Glyn  
Canol y Dre  
Ruthin  
Denbighshire  
LL15 1QW

- d. If Jones Bros Ruthin Co Ltd is confident in your identity then the data access request will be processed.
- e. If Jones Bros Ruthin Co Ltd is not sure of your identity a Subject Access Request form will be sent out to you. A subject access request form will be sent to you or a specific company. The form asks for details of the request and for proof of ID before any information can be divulged. The form is to be completed and sent back to Jones Bros Ruthin Co Ltd at [hrdept@jones-bros.com](mailto:hrdept@jones-bros.com) or mailed to the address above.
- f. Jones Bros Ruthin Co Ltd has 30 days from the date of the data access request to respond with what information is held.

- g. If we do hold information about you we will:
- (1) Give you a description of it;
  - (2) Tell you why we are holding it;
  - (3) Tell you who it could be disclosed to (If any);
  - (4) Any legal retention periods.
  - (5) Let you have a copy of the information in an intelligible and secure form.
8. **What to do if you want us to stop using your personal information?** You have the right to object to our use of your personal information, or to ask us to delete, edit, remove, restrict the use or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object', 'right to erasure', right to rectification or the 'right to be forgotten'. In some cases, information cannot always be deleted for example financial and accounting records that legally need to be kept for a minimum of 6 years.
- a. **How to withdraw your consent.** If you or your company wants to request that information is updated, changed or deleted, you are to contact Jones Bros Ruthin Co Ltd at [hrdept@jones-bros.com](mailto:hrdept@jones-bros.com) or [send a letter to the address provided above.](#)
  - b. If there is no legal reason for Jones Bros to hold the data Jones Bros will erase the data subject's personal data without undue delay.
  - c. Jones Bros will rectify on request any inaccurate personal data.
  - d. Jones Bros Ruthin Co Ltd has 21 days in which to confirm changes or explain why they cannot make the changes requested.
  - e. For any more details please call or e-mail using the contact details above.
9. **Job applicants.** Jones Bros Ruthin Co Ltd is the data controller for the information you provide during the recruitment and employment process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at [hrdept@jones-bros.com](mailto:hrdept@jones-bros.com)
- a. **What will we do with the information you provide to us?** All the information you provide during the recruitment process will only be used for progressing your application, or to fulfil legal or regulatory requirements if necessary. We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us whether the information is in electronic or physical format. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.
  - b. **What information do we ask for, and why?** We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

- c. **Application stage.** If you apply for a role at Jones Bros Ruthin Co Ltd we will either advertise the role directly through our website or occasional use a third-party recruitment agency and your details will be collected on our behalf.
- (1) We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our HR team and hiring manager will have access to all this information.
  - (2) You will also be asked to provide equal opportunities information. This is not mandatory information if you don't provide it; it will not affect your application. This information will not be made available to any staff outside of our HR management team, including hiring managers, in a way which can identify you. Any information you do provide will be used only to produce and monitor equal opportunities statistics.
- d. **Shortlisting.** Our hiring manager's shortlist applications for interview. They will be provided with your name and contact details if you have provided it.
- e. **Assessments.** We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by Jones Bros Ruthin Co Ltd HR with all information provided secured with strict access control.
- f. **Conditional offer.** If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability. You will therefore be required to provide:
- (1) Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
  - (2) Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
  - (3) We may contact your referees, using the details you provide in your application, directly to obtain references.
  - (4) We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work.
  - (5) If we make a final offer, we will also ask you for the following:
    - (a) Bank details – to process salary payments.
    - (b) Emergency contact details – so we know who to contact in case you have an emergency at work.
  - (6) If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool. If you say yes, we would proactively contact you should any further suitable vacancies arise.

- (7) Recruitment Agency. If you use a recruitment agency they will ask you to use an online application system, you will provide the requested information to the recruitment agency that provide this information directly to us.
- (8) If you accept a final offer from us, your personnel records will be held on the Jones Bros secure HR employee records system. This system is secure with strictly controlled access.
10. **Personal Data Breaches.** If any personal data breaches occur Jones Bros will without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the Information Commissioner's Office. All Jones Bros Staff that become aware of any personal data breach are to contact the HR department immediately.
- a. Jones Bros will communicate any personal data breaches to the data subject without undue delay. Providing the following information:
- (1) Provide the name and contact details of Jones Bros contact dealing with the breach
  - (2) Provide details of the likely consequences of the personal data breach;
  - (3) Provide details of the measures taken or proposed to be taken by Jones Bros to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.
- b. Jones Bros will keep a record of any recorded personal data breaches and take all remedial actions required.
11. **Changes to this privacy notice.** We keep our privacy notice under regular review. This privacy notice was last updated on 10 August 2020.
12. **How to contact us.** If you want to request information about our privacy policy you can email us, write or call to:

**Postal address**

HR Department, Head office  
Jones Bros Civil Engineering UK  
Ty Glyn  
Canol y Dre  
Ruthin  
Denbighshire  
LL15 1QW

**E-mail - [hrdept@jones-bros.com](mailto:hrdept@jones-bros.com)**

**Telephone** +44 01824 703661 - Fax 01824 703666 ask to be connected to the HR department  
Our normal working hours are:  
Monday-Friday 8:30am-5:30pm (GMT)

**Cookies**

**Use of cookies on the Jones Bros Ruthin Co Ltd website**

1. An HTTP cookie (also called web cookie, Internet cookie, browser cookie, or simply cookie) is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. Cookies were designed to be a reliable mechanism for websites to remember information (such as items added in the shopping cart in an online store) or



to record the user's browsing activity. (Including clicking particular buttons, logging in, or recording which pages were visited in the past).

2. There are no cookies stored on the user's computer/device when browsing the Jones Bros website. A session cookie is generated, the purpose of which is just so that word press knows it is the same user that is browsing the website as they click from one page to another. This session cookie disappears when the user closes their browser window.
3. The table below explains the cookies we use and why.

Cookie Names	Business	Purpose
PHP session cookie	PHPSESSID	<p>A session cookie is generated, the purpose of which is just so that word press knows it is the same user that is browsing the website as they click from one page to another. This session cookie disappears when the user closes their browser window.</p> <p>Also called a transient cookie, a cookie that is erased when the user closes the Web browser. The session cookie is stored in temporary memory and is not retained after the browser is closed. Session cookies do not collect information from the user's computer.</p> <p>The PHPSESSID cookie is native to PHP and enables websites to store serialised state data. On the Action website it is used to establish a user session and to pass state data via a temporary cookie, which is commonly referred to as a session cookie. As the PHPSESSID cookie has no timed expiry, it disappears when the website is closed.</p>

4. The Jones Bros Ruthin Co Ltd website provides the option to accept the cookie or to reject and close the session cookie.
5. How do I change my cookie settings manually?
  - a. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).
  - b. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

This policy will be reviewed annually and any changes made communicated to all employees.



Rob James  
Director  
10th August 2020