




**SLOANE**

# **Data Protection Policy**

Statement of Intent

September 2024



White Building, Cumberland Place,  
Southampton SO15 2NP  
023 8001 1855  
[sloanecontracting.co.uk](http://sloanecontracting.co.uk)

Registered address: 4th Floor 4 Tabernacle Street  
London, United Kingdom, EC2A 4LU  
Trading as Sloane Squared Interiors  
Registered number 8448887 VAT number 174018814

Sloane (trading as Sloane Squared Interiors Ltd) is a registered data controller and processor (registration no. ZA682009).

We comply with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) which became enforceable on 25th May 2018.

The nature of our work is carpentry and Joinery contracting within the construction industry, we use personal information to enable us to promote our goods and services, to maintain our accounts and records and to support and manage our staff.

#### Type / classes of information processed

We process information relevant for the nature of our work. This may include:

- Personal details
- Financial details
- Employment and training details
- Goods or services provided

We also process sensitive classes of information that may include  
Physical or mental health details

#### Who the information is processed about

- Employees
- Subcontractors
- Customers and clients
- Suppliers and service providers
- Advisors, consultants and other professional experts

We do not use any information for automated decision making or profiling

Where the information is sourced from

- Direct correspondence with individuals or organisations in the normal course of running our business

Who the information may be shared with

We sometimes need to share personal information we process with individuals themselves and other organisations. Where this is necessary, we are required to comply with all aspects of GDPR.

Where necessary we share information with the following types of organisations or individuals:

- Principal Contractors
- Family, associates and representatives of the person whose personal data we are processing
- Employment and recruitment agencies
- Current, past and prospective employers
- Training and examining bodies
- HM Revenue & Customs

How we keep information secure

We take appropriate steps to make sure that the personal information we hold electronically is kept secure and only used by people who have a right to see it.

We do not hold paper records of any personal data.

All data is kept within our 'Docuware' information management system. All staff members are trained in Data Protection and specific company data protection controls and are set up with appropriate access rights to data contained within our system. Docuware is fully GDPR compliant

<https://docuware.com>

Firewalls are in place on the company's internal network, and on all desktops and laptops in use.

If data is being accessed temporarily on desktop or laptops, these devices are locked with biometric data and password protection when not in use. Personal data is not stored on desktops or laptops in the normal course of business. No personal handheld devices, i.e. phones or tablets, are used to process or hold personal data.

Currently no external company or organisation processes personal information on our behalf - if this becomes necessary, suppliers will be vetted in line with our internal PQQ.

### Data Retention Period

We may retain data for differing periods of time for different purposes as required by law or best practice. These retention times are set out within the company's internal archiving procedures. Other statutory obligations, legal processes and enquiries may also necessitate the retention of certain data.

We may store some data such as photographs, team achievements, past project details etc for an indefinite period on our remote server, for reference during future projects.

Individuals have the following right

- The right of access to personal data
- The right to rectification of personal data held where it is incorrect or incomplete
- The right of erasure of personal data ("right to be forgotten") if certain grounds are met
- The right to restrict / suspend processing of personal data
- The right to complain to a supervisory authority

Additional rights that may apply in certain instances

- Right of data portability (if processing is based on consent and automated means)
- Right to withdraw consent at any time (if processing is based on consent)
- Right to object to processing (if processing is based on legitimate interests)
- Right to object to processing of personal data for direct marketing purposes

## Who is responsible for our Data Protection Policy

The Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union, and other provisions related to data protection is:

The Data Controller

Sloane Squared Interiors Ltd

White Building

1-4 Cumberland Place

Southampton

SO15 2NP

United Kingdom

Phone: +44 (0)203 713 972

Website: <https://www.sloanecontracting.co.uk>

Email: [office@sloanescontracting.co.uk](mailto:office@sloanescontracting.co.uk)

## Review of Data Protection Policy

This policy is subject to regular review and will be updated as necessary to reflect any changes in our operational activities, best practice in data management, security and control, and to ensure compliance with any changes or amendments made to applicable law.

If an individual is not satisfied with the way in which we are processing their personal data, they have the right to make a complaint with the Information Commissioner's Office.

<https://ico.org.uk/make-a-complaint/>

Name	Signature	Position	Date
James Sloane		Director	26 <sup>th</sup> April 2024