

JBA Privacy Notice – Sub Contractors / Sub Consultants

21 May 2018

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (GDPR).

The Head of Operations Admin is the data controller at James Blake Associates Ltd, and is responsible for how your personal data is processed and for what purposes. The current contact details are at the end of this statement.

James Blake Associates Ltd complies with its obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

The personal data we collect will be used for the following purposes:

- To manage and pay our subcontractors.
- To enable us to verify qualifications, insurances and licenses.
- To enable us to process invoices.
- To enable us to maintain our own accounts and records.
- To ensure we can comply with our legal obligations.
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Our legal basis for processing the personal data:

We have reviewed the purposes of our processing activities and selected the most appropriate lawful basis (or bases) for each activity.

We have checked that the processing is necessary for the relevant purpose and are satisfied that there is no other reasonable way to achieve that purpose.

We have documented our decision on which lawful basis applies to help us demonstrate compliance.

We have included information about both the purposes of the processing and the lawful basis for the processing in our privacy notice.

Where we process special category data, we have also identified a condition for processing special category data and have documented this.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- The name, company address, and account details required to enable payment to take place.

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- Checks to confirm our subcontractors are who they say they are and that they have the correct amount of insurance.
- Copies of qualification certificates and licence verification to confirm they are able to carry out the work we are contracting them to complete.

This information directly benefits the Sub Contractor as it enables work to be allocated and invoices to be paid.

This information directly benefits James Blake Associates Ltd as it enables us to prove that we have carried out checks in line with our statutory responsibilities and that we are using suitably qualified subcontractors to carry out certain elements of projects where necessary.

If we were unable to store this data, we would be unable to use the subcontractor and unable to meet statutory obligations. We would be unable to use subcontractors to complete certain skilled jobs that require up to date licenses and qualifications.

There is no other way that we could carry out the above functions without storing this data. This information is usual and expected to be kept by the business. Much of the data is sensitive and there are adequate systems in place to ensure the security of the personal data.

We keep a log of legitimate interest assessments to show we have a decision-making process in place.

Disclosure

We won't automatically share your personal data with third parties. If there is a requirement to do so, we will contact you separately and confirm consent at the time.

How long do we keep personal data?

We keep personal data for no longer than reasonably necessary, currently for a period of twelve years after the data subject has ceased working for James Blake Associates Ltd in order to meet our legal and statutory obligations, e.g. in case of any legal claims, requests for references, project enquiries and tax enquiries.

Once we stop using the data subject, we will destroy all non-relevant information and will only keep name, company address and job information (including project work).

How is it stored?

We store your data securely on our server as project correspondence and on our project management system. Data is password protected and access is limited to our employees in the office or over a secure VPN.

Your rights and your personal data

You have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which James Blake Associates Ltd holds about you.
- The right to request that James Blake Associates Ltd corrects any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for James Blake Associates Ltd to retain such data.

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- The right to withdraw your consent to the processing at any time, unless the data is held under legitimate interests.
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, (where applicable).
- The right to lodge a complaint with the Information Commissioners Office.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

Where and whenever necessary, we will seek your prior consent to the new processing.

Consent:

Consent is required for James Blake Associates Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting the data controller by telephone, email or in writing.

Consent can be given in writing or by completing the **Consent Form** below.

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact:

James Blake Associates

Tel: **01787 248216**

Email: Jamesblake@jba-landmarc.com

In writing:

James Blake Associates Ltd

The Black Barn

Hall Road

Lavenham

Suffolk

CO10 9QX

Our internal procedures and policies are reviewed regularly.

Responsibility for Data Processing rests with all employees of James Blake Associates Ltd, however, the Data Controller (Head of Operations Admin) has ultimate responsibility for compliance with the GDPR and responding to Subject Access Requests (SARs).

The notice review date is 21 May 2019.

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Consent

At James Blake Associates Ltd we take your privacy seriously and will only use your personal information to administer your account.

By signing this form, you are confirming that you have read our Privacy Notice and that you are consenting to James Blake Associates Ltd holding and processing your personal data for the purposes listed in the Privacy Notice for Clients.

Name:	
Company:	
Company Address:	
Job Title:	
Tel No:	
Email:	

You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent, we will not be able to use your personal data to keep you informed of the progress of projects you are involved in, to send out information regarding projects or to request information regarding ongoing project work.

If you do grant consent, please note you can withdraw your consent to all or any one of the above purposes at any time by contacting James Blake Associates - Jamesblake@jba-landmarc.com

Please note that all processing of your personal data will cease once you have withdrawn consent, but this will not affect any personal data that has already been processed prior to this point.

Signed:	
Date:	