



Power Lines, Pipes and Cables Ltd (PLPC Ltd) ensures that all personal information handled within the company is processed in accordance with legally compliant standards of data protection and data security. PLPC Ltd recognizes the importance of notifying staff about the types of information held, how it is used, and ensuring they understand our rules and legal standards for handling personal information.

This policy applies to all PLPC Ltd employees, consultants, contractors, casual/agency staff, volunteers, and interested parties/stakeholders who access or generate any information from our sites, offices, or customers.

Types of Personal Information Personal information and activities generated by the company include:

- Information that can identify an individual, either from isolated information or combined with other information held.
- Information stored electronically or on paper in a filing system.
- Statements of opinion as well as facts.
- Information related to staff (present, past, or future) or any other individual whose personal information we handle or control.
- Information obtained, held, stored, organized, disclosed, transferred, amended, retrieved, used, handled, processed, transported, or destroyed.

Categories of Personal Information Processed

- Information provided by employees before or during employment.
- Information from third parties, such as references, supplier/contractor information, customers, landowners, or other interested parties.
- Information available in the public domain.

Employee Personal Information Personal information collected, stored, and used relating to employees includes:

- Home address and contact details (including personal emails, mobile, home numbers).
- Next of kin contact details.
- Recruitment information (application forms/CVs, references, qualification details).
- Pay records, national insurance number, tax details, and employment benefits such as pensions.
- Attendance records (including absence, sickness, non-approved days taken, health/medical information).
- Religious or philosophical beliefs (including specific dietary or holiday requirements).
- Sexual orientation, where disclosed (e.g., details of spouse or partner for benefits administration).
- Gender, where disclosed (used anonymously for national statistics).
- Risk assessments (e.g., pregnancy, colour vision testing).
- Logs and registers related to work activities (e.g., accident and training registers, minutes).
- Performance reviews, training records, and any disciplinary matters, grievances, complaints, non-compliances, or concerns involving employees.
- Supplier and contractor contact information (e.g., pay records, tax/CIS information, performance records, CVs/references).
- Complaints and satisfaction records from interested parties.



Use of Personal Information Authorised personnel will use information to carry out regular business activities, administer employment, engage employees, and address any problems or concerns, including:

- Compiling and circulating staff address lists for contact outside working hours (e.g., faults, working away from home, emergency enquiries).
- Maintaining sickness records and managing absence.
- Monitoring IT systems usage (emails, internet, telephone, mobiles, computer resources).
- Monitoring vehicle records for safe usage and security.
- Handling disciplinary, grievance, or legal matters.
- Conducting performance reviews to monitor competency, performance, and training requirements.

Data Controller Responsibilities PLPC Ltd is the data controller of personal information related to staff employment. We determine the purposes and manner of processing personal information. Information will only be processed for the purposes for which it was originally collected. Systems are in place to ensure data is maintained for a limited period, with data subjects having the right to access or request deletion of information at any time.

Incident Management PLPC Ltd have a detailed incident management procedure for data breaches. This procedure outlines the steps for immediate action, notification procedures, and mitigation strategies.

Accuracy and Corrections Employees have the rights regarding their personal data, including the right to access, correct, and delete their data. If an employee considers any information held about them to be inaccurate, they should notify a manager or the Data Protection Officer. If agreed, the information will be corrected. If not, staff comments will be noted.

Data Security Measures PLPC Ltd will take measures to ensure personal information is kept secure, processed lawfully, fairly, and transparently. Personal information will be collected for specified and legitimate purposes with consent requested. It will not be disclosed outside the employer, except for working requirements such as:

- Administration of employment and associated benefits (e.g., pension or insurance schemes).
- Compliance with legal obligations or assistance in criminal investigations.
- Disclosure to legal and regulatory authorities (e.g., HM Revenue and Customs).
- Disclosure to customers as part of working requirements.
- Disclosure to other parties providing products or services to us.

Anonymization and Pseudonymization Where suitable, the company aims to anonymize or pseudonymize personal data. Documents are protected and access is limited to essential staff only.

Consent By providing personal information to the company, staff consent to the use of personal information (including sensitive personal data) in accordance with this policy.

Compliance Framework These areas will be achieved through the implementation and adherence to a framework of objectives, procedures, and processes that comply with the Data Protection Act 2018, UK GDPR, and associated industry codes, customer, statutory, and regulatory requirements.

Responsibilities The Managing Director is responsible for establishing, communicating, reviewing, and implementing this policy and the supporting management system within PLPC Ltd. The Data Protection



Controller has day-to-day responsibility for data processing and security and developing compliance requirements. All employees and interested parties have a personal responsibility to ensure compliance with this policy and handle all personal information consistently with the principles set out here and within the management system. Managers are responsible for leading by example and monitoring and enforcing compliance.

Training All persons that work for or on behalf of PLPC Ltd. must attend mandatory as part of their induction, on data protection practices and Policy. This ensures everyone is up to date with the latest regulations and company policies.

Policy Breach Any breach of this policy will be taken seriously and may result in disciplinary action. This policy will be displayed at our Carluke office and on the company website, with distribution to customers, suppliers, or any person, group, or organisation on request. To enhance transparency, we will regularly communicate policy updates and changes to all stakeholders' utilisation a combination of emails, toolbox talks, training sessions and our company website. Copies of personal information held are also available on request.

Signed:

A handwritten signature in black ink, appearing to read 'Dale Harrison'.

Dale Harrison
Managing Director

Last Reviewed: April 2025
Next Review Date: April 2026