

POLICY	GROUP	
DATA PROTECTION	RG-DP-POL-001	V1.0

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Date of Next Review:	May 2019

Document Control

Robertson Management System (RMS)

The Robertson Management System (RMS) is the complete management system of Robertson Group and its associated companies. Located in Robertzone, the RMS and its governing documents supersede all previous systems & documents. The RMS shall be deployed across all Robertson projects. This document forms part of the RMS.

Status

In accordance with the RMS, the requirements, methods and responsibilities defined within all Policy, Process, Procedure and Form documentation is mandatory. All Guidance is advisory.

Control

At all times, the document contained in the RMS is the **controlled copy** and is the current version. When printed, the copy is **uncontrolled**, so for information only. It is the user's responsibility to ensure that he / she is using the latest approved version. Relevant control information shall be detailed on the front page of this document by its Responsible Owner.

This document is for **internal use only** by the employees of Robertson Group or associated companies. It shall not be shared with or distributed to any party who is not employed by Robertson Group or associated companies unless **written** permission has been granted by the Accountable Owner.

Amendment Record

Amendments to Governance Documents shall be recorded by their Responsible Owner when saving the document to the RMS in Robertzone. Consequently, it is the RMS which shall be referred to for records of past amendments. There is no amendment record on the document itself.

Purpose

This document has been developed to comply with the Data Protection Act 1998 and the EU General Data Protection Regulation, which comes into effect on 25 May 2018.

Data Protection Policy

Robertson Group is one of the largest independently owned construction, infrastructure and support service companies in the UK, covering the complete built environment lifecycle. We are fully committed to compliance with the requirements of the Data Protection Act (DPA) and the EU General Data Protection Regulation (GDPR).

In order to operate and carry out our business functions, we sometimes need to collect and use data about people with whom we work. These people may include members of the public or current, past and prospective employees, clients, customers and suppliers. In addition, we may be required by law to collect and use data to comply with the requirements of central Government. This data must be processed properly regardless of how it is collected, recorded and used.

We regard the lawful and appropriate treatment of personal data as very important to our successful operation and it is essential in maintaining confidence between the company and those with whom it carries out business. We are committed to being transparent about how we collect data and fully endorse and adhere to the principles of GDPR.

Using appropriate control, monitoring and review procedures, Robertson Group undertakes to:

- Use personal data in the most efficient and effective way to deliver better services;
- Collect and process only the data which is needed;
- Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted;
- Ensure data collected is accurate;
- Not keep information for longer than is necessary;
- Securely destroy data which is no longer needed;
- Take appropriate technical and organisational security measures to safeguard information (including unauthorized or unlawful processing and accidental loss or damage of data);
- Ensure that information is not transferred abroad without suitable safeguards;
- Ensure that there is general information made available to the public of their rights to access information; and
- Ensure that the rights of people about whom data is held can be fully exercised under GDPR.

Robertson Group will make the necessary arrangements to ensure anyone processing data on its behalf undertakes to follow the principles relating to processing personal data as set out in Article 5 of GDPR. The principles will be applied to all the processing of all data including all categories of special personal data.

We will periodically review and update this policy to ensure its continued relevance and suitability to our organisation and its business operations. We will bring this policy to the attention of our employees, all businesses within the Group, our supply chain partners and any other interested parties as required.



Ian Clark
Group Director Audit and Compliance
Robertson Group

May 2018