

JIMGOS MAINTENANCE LTD

DATA PROTECTION AND UK GDPR POLICY

Constructionline Gold Compliance Document 13

Organisation	Jimgos Maintenance Ltd
Document owner	Joseph Olugosi, Managing Director
Approved by	Joseph Olugosi, Managing Director - Signed: J.O
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CONTROLLED DOCUMENT

Document control and approval

Version	Date	Change	Author/approver
1.0	1 August 2026	Initial controlled issue	Joseph Olugosi / J.O

Important implementation note: This document becomes operational evidence only when approved, communicated, implemented and supported by the referenced records. Fields in square brackets must be completed with genuine information before submission.

Purpose and commitment

The Company will process personal data lawfully, fairly, transparently and securely in accordance with the UK GDPR, Data Protection Act 2018 and applicable privacy and electronic communications rules.

Scope

This policy applies to all directors, employees, workers, agency staff, apprentices, consultants and subcontractors working for or on behalf of Jimgos Maintenance Ltd, at offices, client premises, occupied homes, construction sites, vehicles, remote locations and work-related events.

Responsibilities

- The Managing Director provides leadership, resources and annual approval.
- The Responsible Person maintains the system, records, training and monitoring.
- Managers and supervisors plan work, brief teams, verify controls and stop unsafe or non-compliant work.
- Every worker must follow the policy, report concerns promptly and cooperate with investigations.
- Subcontractors must meet equivalent standards and provide evidence when requested.

Policy requirements

- Process data only for identified lawful purposes and document the lawful basis.
- Collect only necessary, accurate data and retain it no longer than required.
- Apply access control, secure devices, encryption/passwords, backups and safe disposal.
- Provide privacy information and facilitate data-subject rights without obstruction.
- Use processors only under appropriate written terms and due diligence.
- Report suspected breaches immediately; assess ICO/data-subject notification within statutory time limits.

Operating procedure

1. Maintain records of processing, retention schedule and privacy notices.
2. Complete data protection impact assessments for likely high-risk processing.
3. Verify identity and respond to rights requests normally within one month.
4. Limit tenant/property photographs and avoid capturing unnecessary personal items.
5. Use approved channels; do not send sensitive data to personal accounts or uncontrolled messaging groups.
6. Contain breaches, preserve facts, assess risk, document decisions and notify where required.

Records, monitoring and review

Access, training, processor, rights-request, DPIA and breach records are maintained. Incident records include discovery time because notifiable breaches may require ICO notification within 72 hours.

Performance is reviewed at least annually and after any significant incident, legal change, complaint, audit finding or material change in operations. Corrective actions are allocated, tracked and closed.

Approval

Name	Role	Signature	Date
Joseph Olugosi	Managing Director	J.O	1 August 2026