



**Temporary Works
forum**

Promoting best practice in
the construction industry.

TW18.052

General Data Protection Regulation (GDPR)

1.0 Privacy notice

- 1.1 Under data protection law, individuals have a right to be informed about how the **Temporary Works Forum Ltd.** (TWf) uses any personal data that we hold about them. This privacy notice explains how we collect, store and use your personal data.
- 1.2 We, the TWf, are the 'data controller' for the purposes of data protection law.
- 1.3 The board of directors has overall responsibility for ensuring that the TWf complies with all relevant data protection obligations.
- 1.4 Our data protection officer is the **Company Secretary** (secretary@twforum.org.uk).

2.0 The personal data we hold

- 2.1 Personal data that we may collect, use, store and share (when appropriate) includes, but is not restricted to:
 - Title;
 - Forename; Surname;
 - Company;
 - Email;
 - Founder (where appropriate); Director (where appropriate);
 - Address;
 - Telephone(s);
 - Membership category; Membership start date;
 - Member type;
 - User name (members' area);
NOTE: We do not hold any passwords. These are set up and controlled by you.
 - Notes;
NOTE: For example: change of company name; when you joined; purchase order number and contact
 - Subs due; Subs paid; Discount;
 - Date paid; Invoice ref; Date of receipt.
- 2.2 If you have asked to be included within a working group(s) your name and Email (for example) will be kept in separate list(s).

Cont./...



3.0 Why we use this data

3.1 We use this data to send you (not exhaustive):

- calling notices, meeting agendas and papers;
- requests for feedback, e.g. consultation documents;
- information about meetings and/or conferences of interest;
- relevant industry-related information, e.g. publications;
- offers from members;
- requests for advice (including those from third parties);
- requests to support industry research, e.g. student dissertations;
- conduct a survey (the basis of which will be set out);
- participate in the activity of working group(s).

4.0 Our legal basis for using this data

4.1 To use your personal information in the ways described, the TWf relies on the following ('the lawful basis for processing'):

Legitimate interest

- We will use your data only in ways you would reasonably expect and which have a minimal privacy impact (or where there is a compelling justification for doing so).

4.2 We only collect and use personal data when the law allows us to. Most commonly, we process it where:

- we need to comply with a legal obligation;
- we need it to perform an official task in the public interest.

5.0 Collecting this information

5.1 The information we collect about you is provided voluntarily because you have (or may have) an interest in the aims and objectives of the organisation. Generally, information is provided by you when you join (or when you change and/or add contacts).

5.2 As part of our activities, we may take photographs, e.g. at meetings or events. These may be used for promoting the aims and objectives of the forum, social media, etc. Consent is assumed but can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

6.0 How we store this data

6.1 Membership information - as well as the list of registrants (those who are not members but who receive an occasional Email) - is kept in one or more spreadsheets.

6.2 Likewise, information may be kept to indicate which working group(s) is of interest.

6.3 Information is removed from mailing list(s) when membership ceases, although will be retained where there is a legal obligation, e.g. company law.

NOTE:

Presently, the membership list is not automated through the use of proprietary software.



6.4 We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

7.0 Data sharing

7.1 In general, we do not share your information with any third party unless the law allows us to do so, e.g. Companies House, accountant and auditor.

7.2 Exceptions to this include, but are not limited to:

- Initiatives that the directors believe will benefit members and the TWf's aims and objectives, e.g. NCE Year Book; Centre of Excellence;
- Enquiries from third parties seeking assistance, e.g. technical advice; auditing and review; potential clients; etc.

7.3 In these instances, it is our general policy to provide a name and Email address (in preference to a telephone number).

7.4 Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected.

8.0 Transferring data internationally

8.1 If required to transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

NOTE:

This is considered unlikely.

9.0 Rights regarding personal data

9.1 You have the freedom to choose how we use your personal information. Part of this is ensuring you understand your data protection rights, which are:

- The right to access your personal information (known as a 'subject action request');
- The right to have your personal information that we no longer need erased from our records;
- The right to have inaccurate personal information amended;
- The right to ask us to stop using your information in certain situations;
- The right to object to your personal information being used for marketing or profiling;
- A right (in certain circumstances) to have a copy of your personal information transmitted electronically to another organisation.

NOTE:

For clarity, the TWf holds a limited amount of personal data (and most, if not all of this, is provided by you when you join or when you amend and/or add a contact). See 2.1.

9.2 If you would like to make a 'subject action request' please contact our **data protection officer**.

9.3 When responding to requests, we:

- may ask the individual to provide (up to) two forms of identification;
- may contact the individual via 'phone to confirm that the request was made;
- will respond without delay (and within one month of receipt of the request);
- will provide the information free of charge.



- 9.4 If a request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.
- 9.5 A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information.
- 9.6 When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

10.0 Complaints

- 10.1 We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.
- 10.2 To make a complaint, please contact our **data protection officer**.

11.0 Contact us

- 11.1 If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**.

12.0 Reference

Guide to the General Data Protection Regulation (GDPR)
Information Commissioner's Office (ICO)

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

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