

Data Protection (GDPR) Policy - **Swallow Hill Homes Limited**

1. Policy Statement

Swallow Hill Homes Limited ("the Company") is committed to protecting the privacy and security of the personal data of our clients, employees, and business partners. We fully comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We ensure that personal data is handled lawfully, fairly, and in a transparent manner.

2. Scope

This policy applies to all personal data processed by the Company, including data collected via:

- Customer enquiries (e.g., TrustATrader, email, or telephone).
- Employee records and payroll.
- Supplier and subcontractor management.

3. Data Protection Principles

We adhere to the following principles regarding all personal data we process:

- **Lawfulness, Fairness, and Transparency:** We will only process data where we have a lawful basis (e.g., fulfilling a contract for construction works).
- **Purpose Limitation:** Data will be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data Minimization:** We will only collect data that is adequate, relevant, and limited to what is necessary for our business operations.
- **Accuracy:** We will take every reasonable step to ensure personal data is accurate and kept up to date.
- **Storage Limitation:** We will keep data only for as long as necessary to fulfill the purpose for which it was collected or to comply with legal/tax requirements.
- **Integrity and Confidentiality:** We implement appropriate technical and organizational measures to protect data against unauthorized or unlawful processing, accidental loss, destruction, or damage.

4. Data Subject Rights

Under the UK GDPR, individuals have specific rights regarding their personal data, which Swallow Hill Homes Limited will uphold:

- **Right to Access:** Individuals can request a copy of the data we hold about them.
- **Right to Rectification:** Individuals can request the correction of inaccurate or incomplete data.
- **Right to Erasure ('Right to be Forgotten'):** Individuals can request the deletion of their data, subject to legal retention requirements.



Swallow Hill Homes Limited

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- **Right to Object:** Individuals can object to the processing of their data where we rely on legitimate interests.

5. Security Measures

- **Digital Security:** We utilize password-protected systems, secure email, and encrypted cloud storage for all project and client data.
- **Physical Security:** Any physical files (e.g., site plans, contracts) are stored in secure, restricted-access locations.
- **Staff Awareness:** All employees and contractors are briefed on the importance of data confidentiality and are prohibited from sharing client information with third parties without authorization.

6. Data Breach Procedure

In the event of a personal data breach, we will:

- Assess the risk to individuals.
- Notify the Information Commissioner's Office (ICO) within 72 hours if the breach poses a risk to the rights and freedoms of individuals.
- Communicate with affected individuals without undue delay where the breach is likely to result in a high risk to their rights.

7. Accountability and Review

The Directors of Swallow Hill Homes Limited hold overall responsibility for data protection. This policy is reviewed annually to ensure compliance with changing regulations and business practices.

Signed: *R Bailey* (Director)

Date: 27/7/2026