

PRIVACY AND DATA PROTECTION POLICY

REVIEW OF SAFETY POLICY

This policy will be reviewed annually by the company and any revision of it will be advised to every employee, contractor and sub-contractor.

Gomolemo Makolomako
POGC LTD

Date of revision
01 May 2019

Monitoring of privacy and data protection policy on how personal information is used and handled.

Reviews of the policy and implementation of any changes will be documented and dated.

This policy has been endorsed by Gomolemo Makolomako, Director and has full support of the management. The policy was approved on 10th of May 2019, following a consultation with senior management. Ms Makolomako has overall responsibility for the effectiveness of this policy.

AUTHORISED BY: Ms Makolomako Director SIGNATURE:  10 May 2019

APPROVED BY: Mr Shirley Director SIGNATURE:  10 May 2019

REVISION AMANDMENT LOG DETAILS

No:	Date:	Reviewer	What was reviewed	Authorised

REVIEW DETAILS: Reviewed Annually

NEXT REVIEW DETAILS: 31 May 2020

This policy will be regularly reviewed and updated as necessary.



PRIVACY AND DATA PROTECTION POLICY

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable privacy and data protection policies to ensure that the Company's – POGC Ltd business is conducted in a socially responsible manner. POGC Ltd ("POGC", "we", "us") are committed to protecting the privacy and security of those with whom we interact. We recognise the need to respect and protect information that is collected or disclosed to us, such as personal information.

In this policy, we intend to inform you how we collect and use personal information during and after your relationship with us, in accordance with applicable Data Protection Laws.

2. Who We Are

POGC is a family owned business within the construction industry offering quality painting, spray-painting, and decorating, plastering and minor building repair solutions to a wide variety of buildings including new builds, refurbishments, schools and social housing associations. Our remit is to offer excellent customer service resulting in a professional and safe environment for our contractors at all times.

As a company, POGC is committed to handling data fairly, lawfully and in a transparent manner whilst also taking our data protection obligations seriously. We ensure that Personal Information is processed in a manner that is compliant with applicable data protection laws, including the General Data Protection Regulation 2016/679 ("GDPR"). We are required by law to inform and notify you of the information contained in the Privacy Notices.

Our Commitment is to:

- Keep your personal data safe and only processing it on a valid legal basis;
- Keep our records up-to-date and deleting or correcting inaccurate personal data;
- Deleting your personal data after it is no longer needed for the purpose you collected it for;
- Not selling your personal data; and
- Giving you ways to manage and review your marketing choices at any time.

3. Descriptions

A Privacy Policy is placed on a company's website to tell the public what data is collected from visitors and what use you make of that data. We do not collect data from the public but there is an internal database of all our clients that we have previously or are currently involved with.

A Data Protection Policy is for your own corporate data. This includes accounting records, customer information, order status, proprietary data, trade secrets, and your daily operational data, like emails, documents, etc. The Data Protection Policy will go into detail about the kinds of data we have, and the level of protection required for each type.

4. PRIVACY NOTICE

A Privacy Policy is placed on a company's website to tell the public what data is collected from visitors and what use you make of that data. We do not collect data from the public but there is an internal database of all our clients that we have previously or are currently involved with.

4.1 What is Personal Information and What Personal Information Does POGC Collect About You?

Your personal data is any information relation to you from which you can be identified, directly or indirectly. This information will include, for example, your name, address, telephone number, location data, online identifier, such as cookies and IP address; photographs or one or more factors specific to your physical, physiological, genetic, mental, financial, economic, cultural or social. Other information included that does not, on its own identify you, will be combined with that information that identifies you to will be treated as Personal Information.

We may collect use, store and transfer different kinds of Personal Information about you including your name, contact details, medical and healthcare information, bank details, time sheet information, employment history, driving licence and passport, gender, disciplinary and grievance information, performance information, recruitment information, criminal offence data, race, ethnicity, religious beliefs, location of employment or workplace, employer's details, compensation history, photographs and



video images, and biometric data in the form of fingerprints (please see Appendix III of this Privacy Notice in respect of our use of biometric data).

Where you provide personal data about another person, this policy will also apply to that data so please share it with that person.

4.2 How Is Your Personal Information Collected?

This policy applies to any personal data which you may provide to us in person, over the telephone, by email, on our website and/or by post. This policy also applies to any personal data which we may collect from third parties about you and/or which we may collect when you access our website and/or in the course of our relationship. When we combine other information (i.e. information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

You can choose not to give personal data. We may need to collect personal data by law, or under the terms of a contract and/or relationship that we have with you. If you choose not to give us this personal data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services so we cancel a product or service you have with us.

Wherever we refer to “processing” of personal data in this Privacy Notice / Policy; this includes any combination of the following activities: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We may collect personal data from you in the following ways:

- When you make an enquiry, register for a website, sign-up for alerts on our website;
- When you contact us in person, over the telephone, by email, by post or social media;
- When you apply for our products and services;
- In any customer surveys;
- When you use our services; or
- Payment and transaction data.

We may collect your personal data from third parties we work with including:

- Companies that introduce you to us;
- Suppliers of materials and equipment;
- Trade contractors;
- Social networks;
- Payroll service providers;
- Public information sources such as Companies House;
- Government and law enforcement agencies.

Our website uses ‘cookies’ - a small file of letters and numbers that are stored on your computer by the websites you visit. We use cookies to improve your user experience by enabling the website to ‘remember’ you, either for the duration of your visit (using a ‘session cookie’) or for repeat visits (using a ‘persistent cookie’), this enables us to show content relevant to you on your next visit. We also use cookies to track usage, analyse trends and gather information on how customers use our website which allows us to improve our website. Cookies are not linked to other personally identifiable information.

The type of information we may ask you to provide about yourself and therefore collect includes, but is not limited to:

- Contact details such as your name, address, contact telephone number (mobile and landline) and email address;
- the nature of your enquiry;
- Contractual details about the products or services we provide to you;
- Locational data we get about where you are, such as data that may come from your mobile phone or the address where you connect a computer to the internet;
- Behavioural details about how you use our products and services;
- Technical details on the devices and technology you use;

- Communications: what we learn about you from letters, emails and conversations between us;
- Social relationships: your family, friends and other relationships;
- Open data and public records details about you that are in public records, such as the electoral register, and information about you that is openly available on the internet;
- Usage data: other data about how you use our products and services; and
- Documentary data details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or birth certificate.

Please note that we may require this information to be able to respond to your enquiry or to provide our services or marketing information to you. You can however at any time tell us to change or remove any personal data or to stop or restrict the processing of your personal data.

4.3 How Your Personal Information Is Used.

We may use the personal data collected/provided by you to:

1. Ensure that content from our website is displayed in the most effective way for you and for your computer/device;
2. Respond to your enquiry;
3. Send you information about similar products and services;
4. Notify you about changes to our service;
5. Carry out analysis to make improvements to our website and/or services;
6. Measure or understand the effectiveness of advertising we deliver to you and others;
7. Monitor customer service including processing customer satisfaction surveys;
8. Keep our records up to date;
9. Develop and manage products and services, and what we charge for them;
10. Define types of customers for new services;
11. Develop and carry out marketing activities;
12. Study how our customers use our services;
13. Develop and manage our brands;
14. Manage how we work with other companies that provide services to us and our customers;
15. Make and manage customer payments;
16. Collect and recover money that is owed to us;
17. Comply with laws and regulations that apply to us;
18. Detect, investigate, report, and seek to prevent financial crime and fraud;
19. Manage risk for us and our customers;
20. Respond to complaints and seek to resolve them; and to
21. Run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.

5. Legal basis for processing Your Personal Information.

We need to have a proper reason under the GDPR whenever we process your personal data ourselves or share it with others outside of POGC & Liba Decorative Solutions Ltd.

These reasons are:

- To fulfil a contract we have with you or to take steps at your request prior to entering into a contract with you;
- When it is our legal duty;
- When it is in our legitimate interest or the legitimate interest of a third party except where such interests are overridden by your interests or your fundamental rights or freedoms; or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to process your personal data, but this must not unfairly go against your rights. If we rely on our legitimate interest, we will tell you what that is.

Unless we have your explicit consent to do so, we will not process special categories of personal data revealing any of the following information about you: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life or sexual orientation.

Where we have stated above that our grounds are that we have your consent, we will understand your consent to have been given when you expressly accept these terms. You can withhold or withdraw your consent at any time using the contact details for the DPO or the Company Secretary in this notice.

Where we don't have your express consent we may base our processing of your personal data on any other basis that applies. If we intend to use your personal data for any purpose not stated above we will first notify you of the intended use and the legal grounds.

You can choose which channel you'd like us to contact you on, for marketing purposes and with information regarding our products and services at the point this information is collected – this can be done by checking or unchecking the relevant boxes as directed. If you no longer wish for us to communicate with you, you can follow the instructions on how to unsubscribe from emails, letters or texts by following the details within those communications to you. Alternatively you can contact us by post or email at the address provided.

6. Sharing Your Personal Information

We may disclose your personal data to third parties in certain circumstances but we will not sell, rent or trade your personal data.

Your personal data may be transferred outside the UK and the European Economic Area. Some countries have adequate protection of personal data under their laws but where this is not the case we will be responsible for ensuring that appropriate security and privacy safeguards are in place, either by requiring the recipient to have signed up to a recognised international framework of data protection or by contractual obligations.

Where relevant, we may give third party providers who supply services to us, or who process personal data on our behalf, access to your personal data in order to help us to process it for the purposes set out above. When doing so, we will ask them to confirm that their security measures are adequate to protect your personal data.

Within the purposes set out above we may share your personal data with the following third parties:

- With your consent, we will also pass your personal data on to third parties, for example if you ask us to put you in contact with professional advisors.
- We may disclose your personal data to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our contracts with you, or to protect our rights, property, or our safety and/or the safety of our customers, or others.
- We may need to confirm your identity before we provide products or services to you or your business. We may also share your personal information as needed to help detect fraud and money-laundering risks. We may use solicitors and other advisers for these purposes. We may allow law enforcement agencies to access your personal data. This is to support their duty to detect, investigate, prevent and prosecute crime.
- We may disclose your personal data to third parties in the event that we sell any part of our business, in which case we may disclose your personal data to the prospective buyer of such business or assets. If any part of our business is acquired by a third party, personal data held by us may be transferred.

7. Protecting Your Information

We will seek to keep your personal data secure by taking appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Only authorised personnel and third parties will have access to your personal data.

If logging on to our website it is your responsibility to protect log in details. You must treat these as confidential and must not share or disclose your log in details to any other party.

We will retain your personal data for no longer than the period of time needed for the purposes that we collected the data and for as long as we have legal grounds to retain it. There is no fixed period after which all record of your personal data will be deleted as this will depend on the circumstances and the purposes of the processing but we will take steps and maintain policies to keep retention under proper review. We will not seek your consent before deleting any personal data.

8. Changes to this Policy / Notice

Any changes we may make to this Policy / Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes.

9. Your Right Of Access to Your Personal Data

You have the right to access your personal data including us providing to you, without charge, a copy (which may be in electronic form) of any of your personal data that we are processing or that third parties are processing on our behalf.

We will also provide to you, if you request it, the following information:

1. The purposes of the processing;
2. The categories of personal data concerned;
3. The recipients or categories of recipient to whom the personal data have been or will be disclosed;
4. Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
5. If the personal data was not collected from you, any information available to us as to the source of it;
6. Whether the personal data has been subject to automated decision-making, including profiling, and, if so, information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Requests for this information or a copy of your personal data should be in writing, enclosing proof of identification such as a copy of your passport, driving licence or other documentation confirming your name and address (for example a utility bill) to be addressed to:

F.a.o Administrator
POGC Ltd
Unit 115
52 Upper Tooting Road
London
SW17 7PD

Email: admin@pogc.co.uk

10. Your Right To Removal or Correction of Personal Information and To Restrict Processing

You have the following rights under GDPR:

- A right to request that we correct inaccurate or incomplete data (“Right to rectification”);
- A right to request that we delete any of your personal data. In certain circumstances we may wish to retain data and if GDPR allows us to do so we will inform you of our grounds (“Right to erasure” or “Right to be forgotten”); and
- A right to request that we stop or restrict any aspect of the processing of your personal data. In certain circumstances we may wish to continue and if GDPR allows us to do so we will inform you of our grounds (“Right to restriction of processing”).

In each case we will tell you what action we are taking and we will also notify any third party to whom the data has been disclosed. Your request should be made to the address above.

11. Your rights concerning automated processing and profiling

You have the following rights under GDPR over automated decisions and profiling.

- You can ask that we do not make our decision based on the automated score alone.
- You can object to an automated decision, and ask that a person reviews it.
- You can object to the use of your personal data in profiling or direct marketing.

Your request should be made to the address above.



12. Your rights concerning data portability

You have the right to receive from us the personal data that you have given us in a structured, commonly used and machine-readable format ("Right to data portability") and/or to have the data sent by us directly to another party. Please note that this right only applies in certain circumstances, which is when we held the data on grounds of your consent or to perform a contract with you or for steps preparatory to such a contract and we were processing that data by automated means.

Your request should be made to the address above.

13. Your rights to complain to the regulator

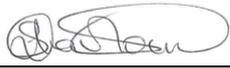
Please let us know if you are unhappy with how we have processed your personal data. You can contact us by writing to the Administrator. You have the right to lodge a complaint with the Information Commissioner's Office (ICO) which is the UK supervisory authority for the processing of personal data. Further details are available on the ICO's website.

14. Enquiries and to exercise rights

If you have any questions, or want more details about how we process your personal data or if you wish to exercise any of your rights, you can contact us by writing to the Administrator at the address given above.



This policy is authorised and approved by POGC company executives. It will be regularly reviewed and updated as necessary.

AUTHORISED BY: Ms Makolomako Director SIGNATURE:  10th May 2019

APPROVED BY: Mr Shirley Director SIGNATURE:  10th May 2019