



**Correspondence Address**  
32 Bellevue Farm Road, Pease Pottage  
West Sussex, RH11 9GU

# Privacy Policy – Subcontractors

## PalmerWebb Limited

### 1. Introduction

PalmerWebb Limited is committed to protecting the privacy and security of personal data. This Privacy Policy outlines how we collect, use, store, and protect personal data in compliance with relevant data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### 2. Scope

This policy applies to all personal data processed by PalmerWebb Limited, including data relating to employees, sub-contractors, clients, and other stakeholders.

### 3. Data We Collect

PalmerWebb Limited may collect the following types of personal data:

- Sub-contractors: Name, contact details, financial details (for payments), professional qualifications, background checks, and contractual agreements.
- Employees: Name, address, contact details, employment history, payroll information, and performance records.
- Clients and Suppliers: Business contact details, communication records, and transaction history.

### 4. How We Use Personal Data

We process personal data for the following purposes:

- Managing business relationships with sub-contractors, clients, and suppliers.
- Fulfilling contractual obligations, including payments and compliance with regulatory requirements.
- Ensuring workplace security and access control.
- Complying with legal obligations, such as tax and employment laws.
- Protecting the legitimate business interests of PalmerWebb Limited.



## 5. Legal Basis for Processing

We process personal data under the following lawful bases:

- Contractual necessity: To fulfil our agreements with sub-contractors and employees.
- Legal obligation: To comply with applicable laws and regulations.
- Legitimate interests: To manage and protect our business operations.
- Consent: Where required, we will obtain explicit consent before processing certain types of data.

## 6. Data Sharing and Disclosure

PalmerWebb Limited may share personal data with:

- Regulatory authorities where required by law.
- Professional advisors, such as auditors and legal consultants.
- Third-party service providers who process data on our behalf (e.g., payroll services, IT support).
- Clients where necessary for project execution, with appropriate safeguards in place.

We do not sell or share personal data for marketing purposes.

## 7. Data Retention

Personal data is retained only for as long as necessary to fulfill contractual, legal, or regulatory obligations.

Upon expiry of the retention period, data is securely deleted or anonymized.

## 8. Data Security

We implement appropriate technical and organizational measures to protect personal data from unauthorized access, loss, or misuse. This includes encryption, access controls, and regular security audits.

## 9. Rights of Data Subjects

Individuals have the following rights under data protection laws:

- Access: Request a copy of personal data held.
- Rectification: Request corrections to inaccurate or incomplete data.
- Erasure: Request deletion of personal data under certain conditions.
- Restriction: Request limited processing of personal data.
- Objection: Object to processing based on legitimate interests.
- Data Portability: Request a structured, commonly used format for personal data transfer.
- Requests regarding these rights can be submitted to our Data Protection Officer.





## 10. Sub-Contractors' Responsibilities

Sub-contractors engaged by PalmerWebb Limited must:

- Adhere to this Privacy Policy and applicable data protection laws.
- Process personal data only for authorized purposes.
- Implement appropriate security measures.
- Report any data breaches to PalmerWebb Limited immediately.

## 11. Policy Updates

This policy will be reviewed annually and updated as necessary to reflect changes in legal or business requirements.

## 12. Contact Information

For questions or concerns regarding this policy, please contact:

Data Protection Officer

PalmerWebb Limited

Address: 32 Bellevue Farm Road, Pease Pottage, West Sussex, RH11 9GU

Email: [data.protection@palmerwebb.co.uk](mailto:data.protection@palmerwebb.co.uk)

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