



Privacy Policy

Megan Mechanical Services Limited (“we” or “us”) are committed to protecting the privacy and security of those with whom we interact. We recognise the need to respect and protect the personal data that is provided to or collected by us.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us during and after your relationship with us, in accordance with the rules on processing personal data that are set out in the General Data Protection Regulations (“GDPR”).

Definitions

Data Controller - A controller determines the purpose and means of processing personal data

Data Processor - A processor is responsible for the processing of personal data on behalf of a controller

Data Subject - Any living individual whose personal data is collected, held or processed by an organisation.

Categories Of Data - Personal Data and Special Categories of Personal Data

Personal Data - The GDPR applies to ‘personal data’, meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier (as explained in Article 6 of the GDPR). Examples of personal identifiers include information such as name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special Categories of Personal Data - The GDPR refer to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - Means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alternative, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third Party - Means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

The Principles

Megan Mechanical Services Ltd shall comply with the principles of data protection (the principles) as enumerated in the UK General Data Protection Regulation. We will make every effort possible in everything we do to comply with these principles. The principles are:

i. Lawful, Fair and Transparent

Data collection must be fair, for legal purpose and we must be open and transparent as to how the data will be used.



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- ii. **Limited for its Purpose**
Data can only be collected for a specific purpose.
- iii. **Data Minimisation**
Any data collected must be necessary and not excessive for its purpose.
- iv. **Accurate**
The data we hold must be accurate and kept up to date.
- v. **Retention**
We cannot store data longer than necessary.
- vi. **Integrity and Confidentiality**
The data we hold must be kept safe and secure.

Fair and Lawful Processing

We must process personal data fairly and lawfully in accordance with individuals' rights under the first Principle. This means that we should not process personal data unless the individual whose details we are processing has consented to this happening. At least one of the following conditions must apply whenever we process personal data:

- i. **Consent**
We hold recent, clear, explicit and defined consent for the individual's data to be processed for a specific purpose.
- ii. **Contract**
The processing is necessary to fulfil or prepare a contract for the individual.
- iii. **Legal Obligation**
We have a legal obligation to process the data (excluding a contract).
- iv. **Vital Interests**
Processing the data is necessary to protect a person's life or in a medical situation.
- v. **Public Function**
Processing necessary to conduct a public function, a task of public interest or the function has a clear basis in law.
- vi. **Legitimate Interest**
The processing is necessary for our legitimate interests. This condition does not apply if there is a good reason to protect the individual's personal data which overrides the legitimate interest.



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Who Are We?

Megan Mechanical Services Limited are a company who provide, design, supply and installation of mechanical services to the construction industry within London and the South East.

We need to collect your personal information for the purposes of running our business and managing our relationship with you. We are committed to protecting and respecting your privacy and we will comply with our obligations under the Data Protection Law.

The Purpose of Processing Your Personal Data

We use your personal data for the following purposes:

- For the performance of our services in accordance with our contract with you
- To comply with a legal or statutory obligation
- To comply with UK and foreign law
- To protect your vital interest or interest of another individual
- To correspond with you, statutory of other authorities and organisations as necessary for the performance of our services
- To carry out identity checks as may be required by law
- To carry out credit checks
- To recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking legal action
- To analyse the information to improve the service we provide and our business
- To notify you of any changes to service
- To maintain our accounts and records
- To improve our services and communications
- For training and quality purposes
- For documents and records produced by you and your colleagues whilst carrying out your duties and business of the company

The Personal Data We Hold

The personal data as described in section 1, these include but may not be limited to:

- Title, full name, home address
- Contact telephone numbers and private email address
- Date of birth and marital status
- National Insurance number and Unique Tax References
- Forms of identification (e.g. driving licence, passport)
- Company terms and conditions, including any amendments to it including pay rise letters.
- Emergency contacts
- Records of appraisals, holiday, sickness, other absences and training
- Timesheets of your hours worked



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Much of the information we hold will have been provided by you but sometimes it may come from other internal sources, such as your project manager, or in some cases, from external sources such as referees. The information is used to comply with taxation, accounting or legal requirements.

Special Categories Personal Data

We do not normally request or process special categories of information relating to your racial or ethnic origin; political, religious and philosophical beliefs; trade union membership; biometric data or sexual orientation. If we do need to obtain this data, we will always ask you for your consent. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

But where necessary, we keep information about your health, which could include a health declaration, reason for absence and GP reports and notes. This information will be used to comply with our health and safety policy and our occupational health obligations. We may also need the data to administer and manage statutory sick pay

Sharing Your Information

Your information will be treated as strictly confidential and will be shared only with authorities, organisations and individuals for the purposes set out in section 3, such as HMRC, pension providers, third party legal and HR advisors or other parties where we have your permission to do so, such as references or mortgage companies.

How Long Do We Keep Your Personal Data?

Your personal data will be retained for as long as is reasonably necessary for the purposes listed in section 3 above. This may mean that we hold your personal information for some time where, for instance we are obliged to keep for taxation, accounting or legal requirements.

Transmission - Storage and Security of Your Personal Data

Your data is transmitted electronically, for example to HM Revenue & Customs. Unfortunately, no data transmission over the internet or any website can be guaranteed to be secure from intrusion.

We maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with applicable data protection laws.

All information within our control is stored on our secure computer systems or hard copies are kept locked away and access is restricted.

Your Rights and Your Personal Data

Unless subject to an exception under GDPR, you have the rights with respect to your personal data:

- The right to be informed: to know how and why we use your personal data, as described in the privacy policy
- The right to access: to request a copy of the personal data which we hold about you
- The right to rectification: to request that we correct any personal data if it is found to be inaccurate or out-of-date



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- The right to erasure: to request your personal data is erased where it is no longer necessary to retain such data
- The right to restrict processing: to withdraw your consent to the processing at any time, where consent was your lawful basis for processing data
- The right to portability: request that we provide you with your personal data and where possible, to transmit data, where you can reuse your personal data for your own purpose across different services in a safe and secure way
 - The right to object to the processing of personal data base on legitimate reason (i.e. if it causes unwarranted and substantial damage or distress)
 - The right not to subject to automated decision-making, including profiling NB: As a company we do not use any form of automated decision making

Transfer of Data Abroad

We do not transfer personal data outside the UK.

Changes to Our Privacy Policy

We shall notify you by email or by post of any changes we make to our privacy policy in the future.

Contact Details for Requests or Complaints

Gerald Ley, Director of Megan Mechanical Services Ltd, is the Data Controller and Stephanie Davis, Office Manager, is the Data Protection Officer for the purposes of the GDPR.

If you have any concerns as to how your data is processed, you can contact the Data Protection Officer by emailing Stephanie.davis@megan-mechanical.co.uk, by telephone 01252 874 738, or you can write to the Data Protection Officer at Megan Mechanical Services Ltd, Unit 4 Blackbushe Business Park, Yateley, Hampshire, GU46 6GA.

An acknowledgment of receipt to complaints will be sent within 3 days of receiving them. The DPO, within 21 days of the initial complaint, and without undue delay, will investigate making appropriate enquiries, keep people informed, and provide information on the outcome of their complaints.

In order to process your complaint, we may request evidence or supporting information in order to investigate complaints sufficiently. We may also request ID (passport or driving licence) to confirm the data subject's identity. If we receive a complaint acting on behalf of another (e.g. a power of attorney or authority) we may require a letter of authority from the person, they are acting on behalf of.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 02021 231 113, via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office address Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.



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Complaint Types

Complaints can include:

- an employee may raise a grievance issue, and also request copies of their personal information; or
- a person may complain about a customer service issue, and also request that you delete their information.
- the way you've responded to their subject access request (SAR), or other rights request;
- the security measures you've used to store their information (e.g. someone who has been impacted by a data breach, regardless of whether it's reportable to us); or
- how you've collected or used their personal information (e.g. where you've stored it, how long you've kept it for, or its accuracy).

A handwritten signature in black ink, appearing to read 'G. Ley', is positioned to the left of the printed name and date.

Gerald Ley
19 June 2026