

DATA AND PRIVACY PROTECTION POLICY

DATA PROTECTION POLICY

Legislation

HW Coates is the data controller for the personal data described in this policy. The Company is committed to processing personal data in accordance with its responsibilities under the Data Protection Act 2018 and the UK General Data Protection Regulation, as applicable.

What we hold and why

HW Coates may hold personal details but this will be restricted to what is required to operate the business. This data may be collected through your interactions with the company, e.g. employment, enquiries, setting up new contracts, credit control, use of contractors, etc. The types of personal data that may be held on file can include, but is not restricted to:

- Names and addresses
- Telephone numbers
- E-mail addresses
- Driving licence details
- Individual training details
- Financial details

Personal data will not be collected when it is not needed for a specified purpose. HW Coates does not intentionally collect special category personal data, unless this is necessary and permitted under data protection law.

How we process data

HW Coates will only use personal data with the person's consent, or where it is necessary:

- To enter into, or perform, a contract with the person
- To comply with a legal duty
- To protect the person's vital interests
- For our own (or third party's) lawful interests, provided the person's rights do not override these

In any event, the personal data collected will only be used for the purpose or purposes it was collected for.

The company may process personal information for certain legitimate business purposes, which include some or all of the following:

- Where the processing enables the company to enhance, modify, personalise or otherwise improve the services/communications for the benefit of its customers
- To identify and prevent fraud
- To enhance the security of the company's network and information systems

Whenever data is processed for these purposes the company will ensure that it always keeps the person's personal data rights in high regard and take account of these rights at all times.

Sharing information

Information may be shared only where this is necessary for the legitimate operation of the business. Examples of who we may share this information with include auditors, regulators and credit check agencies.

Information stored by the company will only be used in the course of running the business and will not be sold on to third parties.

Storage of information

All personal data collected will be securely stored where necessary on modern systems that are kept up to date, whether in electronic or hardcopy form. Access to personal data is limited to personnel who need access. Personal data is used and stored only for as long as it is required for the purposes for which it was collected. How long information is stored depends on the information in question and what it is being used for.

The company continually reviews what information it holds to ensure it is accurate and deletes data from the systems owned and operated by the company that is no longer required. Similarly, any hardcopy information will be securely destroyed.

Closed Circuit Television (CCTV) and vehicle cameras (including dashcams)

HW Coates uses CCTV including vehicle cameras for the purposes of the prevention & detection of crime, and investigation into operational, health & safety, and environmental issues. This allows the company to recognise and identify individuals, equipment and conditions with a view to taking appropriate action where necessary.

Each site's management team has overall responsibility for the daily operation and maintenance of its site and vehicle camera systems. Only authorised individuals have access to CCTV and camera footage, which may be viewed live or via recordings following an identified issue.

CCTV and camera footage will be stored on the recording equipment which will be securely protected. Footage (which may include audio recordings) is retained for up to 30 days but may be retained longer in the event that it is required as part of an investigation. Footage and images that are retained for an investigation will be securely stored by the site manager.

Telephone call recording

Phone systems used by HW Coates may be recorded for the purposes of training staff and for investigating or verifying operational issues. Recordings will be stored for 180 days, or longer if required as part of an investigation. Only authorised individuals have access to recordings.

Data breaches

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personnel data, the company shall promptly assess the risk to people's rights and freedoms and, if appropriate, report the breach to the ICO.

Individual Rights

Individuals have the right under data protection law to request the following, where applicable:

- Access to their personal data (Data Subject Access Request)
- Correction of inaccurate data
- Deletion of data where appropriate
- Restriction of processing
- Objection to processing
- Data portability where applicable

Any request will be reviewed and handled in accordance with the Data Protection Act 2018 and UK GDPR.

Data Subject Access Requests (DSAR)

A DSAR may include, but is not limited to, written records, CCTV and camera footage, and telephone records. DSARs can be made verbally or in writing and should be raised with a General Manager or Director. A DSAR will be investigated and responded to within 30 days. If the DSAR is complex and more time is required, up to an additional 60 days, the individual will be informed within 30 days.

Where a DSAR is manifestly unfounded or excessive the Company may charge a reasonable fee taking into account the administrative costs, or as a last resort, refuse to respond. The Company may

withhold personal data related to a complaint or DSAR if disclosure would adversely affect the rights and freedoms of others. Where possible information about others will be redacted before responding. If there is any doubt regarding a DSAR guidance will be sought from the Information Commissioner.

Questions and concerns

Questions about this policy, requests to exercise data protection rights, or concerns about how personal data is handled should be sent to enquiries@hwcoates.co.uk.

Individuals also have the right to raise a concern with the Information Commissioner's Office if they are unhappy with how their personal data has been handled. The Company encourages individuals to contact HW Coates first so that any concerns can be reviewed and addressed promptly.

Tom Coates.

T Coates
Chairman

July 2026

PRIVACY POLICY

At HW Coates we respect the privacy of every individual who visits our website or communicates with us. The information you give to us is only used when dealing with you.

The following policy statement outlines the information HW Coates will collect and how we will use that information. It also lets you know what to do if you want us to remove your personal information that has been collected or stored during previous visits to the site.

How we collect and use personal information

We follow strict security procedures in the collection, storage and disclosure of the information you have given us, to prevent unauthorised access and misuse, in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.

We do not collect any personally identifying information from you unless we specifically need it - for example, to send you an information pack about our business, services and costs, or get you in contact with a local office.

We may use aggregate information and statistics for the purposes of monitoring website usage (numbers of visitors, where they are located, etc.) to help us develop the website and our services and we may provide such information to third parties. These statistics will not include any information that could personally identify you.

Whenever you send us information, we will not sell this information to third parties. Your information will be handled in accordance with this policy and used only for the purposes for which it was provided, unless disclosure is required or permitted by law.

We reserve the right to disclose individually identifiable information to comply with applicable laws and lawful government requests, or to protect ourselves or our users.

Acceptance of these Terms

By using this website, you agree to this Privacy and Data Protection Policy. If you do not agree to this policy, please do not use the website. HW Coates reserves the right to change this policy at any time. Your continued use of the HW Coates website following the posting of changes to our Privacy and Data Protection Policy will signify your acceptance of those changes or improvements.

USE OF COOKIES – COOKIE POLICY

What is a cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile phone (referred to here as a “device”) browser from a website’s computer and is stored on your device’s hard drive. Each website or third party service provider used by the website can send its own cookie to your browser if your browser’s preferences allow it, but (to protect your privacy) your browser only permits a website or third party service provider to access the cookies it has already sent to you, not the cookies sent to you by other sites or other third party service providers.

Cookies record information about your online preferences and allow us to provide the most relevant website experience. Users have the opportunity to set their devices to accept all cookies, to notify them when a cookie is issued or not to receive cookies at any time. The last of these means that certain personalised services cannot then be provided to that user and accordingly you may not be able to take full advantage of all of the website features. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.

How does HW Coates use cookies?

Information supplied by cookies can help us analyse how visitors use the website and help us provide a better user experience. Where cookies require consent, we will seek consent in accordance with applicable law.

A list of the main cookies that HW Coates sets, with ways to minimise the number of cookies you receive:

Cookie Name:
Google Analytics

Name:
_utma,
_utmb,
_utmc,
_utmz

Purpose

These cookies are used to collect information about how visitors use our site. We use the information to compile reports and help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from, and the pages they visited.

For more information see [Google Privacy Overview](#).

Further information

Additional information regarding cookies and opting-out is available at

[Your Online Choices](#) and [All About Cookies](#).

Contact details

We welcome your views about our website and our privacy policy. If you would like to contact us with any queries or comments, please email us at enquiries@hwcoates.co.uk