

Health and Safety Policy

Policy Statement in accordance with S2(3) Of the Health and Safety at Work Act 1974

General Policy:

Bronzeshield Lifting Ltd., (The Company) is committed to ensure, so far as is reasonably practicable, the health, safety and welfare of all its employees and all other persons during the execution of the Company's business.

The Company will provide and maintain, as far as is reasonably practicable, the following:

- a. Plant and systems of work that are safe and without risks to health.
- b. Arrangements for ensuring the safe use, handling, storage and transport of 'articles and substances' which are inherently or potentially dangerous.
- c. The provision of comprehensive information, instruction, training and supervision – with the object of ensuring, so far as is reasonably practicable, the health and safety at work of every employee.
- d. The maintenance of the workplace in a safe and risk free condition and the provision of safe means of access and egress.
- e. A safe and healthy working environment with adequate welfare facilities and arrangements.

The Company is committed to the implementation of all Statutes, Orders, Regulations and Codes of Practice in pursuance of the provision of Health and Safety at Work Act.

It is the policy of the Company that all employees, whilst at work, have full knowledge of and due regard for their duty to:

- a. Take reasonable care for the health and safety of themselves and of others who may be affected by their acts or omissions at work and
- b. As regards any duty or requirement imposed on his employer or any other person by or under any of the relevant Statutory Legislation, to co-operate with his employer or other person so far as is necessary to enable that duty or requirement to be performed or complied with.

Arrangements for Health and Safety within the Company:

The arrangements for the purpose of monitoring health and safety performance within the Company for controlling and where possible, eliminating hazards and risks to health and safety will, in conjunction with HSG (65) be as follows:

1. The procedures for operating a proper and safe method of working whilst using plant and equipment is as prescribed by the manufacturer's operating instructions contained in the plant or equipment (PUWER Regulation 8), Crane file and task specific Method Statement and Risk Assessment (LOLER Regulation 8).
2. Operators, engineers, supervisors and foremen are responsible for ensuring that the practices contained within the above documents stated at 1. above are fully implemented.
3. All employees are encouraged to review safe working practices and recommend changes and/or improvements in so far as they are reasonably practicable to their appropriate manager or supervisor.
4. All accidents or incidents involving injury to the person or damage to the property of employees of the Company or persons who may be exposed to risks to health and safety arising out of or in connection with the activities of the Company whilst at work and damage to the Company's and Customer's property shall be reported to the management personnel responsible for that activity.

The management personnel will be responsible for notifying the necessary authorities as per the procedures prescribed within the Company Health and Safety Manual and for keeping the Managing Director fully informed of all such incidents.

All managers are responsible for ensuring that employees under their supervision are aware of and understand the requirements imposed by this manual and that they bring to the Company's attention all concerns expressed by those employees.

5. Procedures setting out the action to be taken in circumstances when a fire alert is given are displayed throughout the Company's premises and the point of assembly for roll call.
6. This Policy is implemented by the procedures and controls which are defined in this Safety Manual which will be maintained to ensure that it reflects the requirements mandated by Regulations concerning Health, Safety and Welfare in the workplace.

Any revision and subsequent amendments which may be made to this Policy will be notified to employees of the Company and/or other persons who may be exposed to risks to their health or safety arising out of or in connection with the activities of employees of the Company and placed on a notice board in the Company's premises.

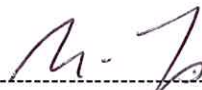
The Managing Director, Mr. W.C. A. Frost is ultimately responsible for the Company's Health and Safety Policy

W.C.A. FROST
MANAGING DIRECTOR
BRONZESHIELD LIFTING LTD



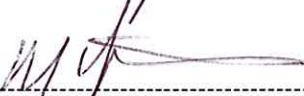
-----Date: 04th August 2021

M. JONES
FINANCE DIRECTOR
BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021

M. STEVENS
UK SALES DIRECTOR
BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021

Environmental Policy Statement

Bronzeshield Lifting Ltd is committed, through compliance with relevant environmental legislation, industry standards and best practice, to ensuring the protection of the environment and others that may be affected by its activities.

The Policy shall be communicated to all personnel under our control and other stakeholders as required. The defined organisation structure, specified environmental responsibilities and the provision of adequate resources shall allow for the effective implementation of the Policy throughout the organisation.

The Environmental Policy and progress towards objectives shall be regularly monitored and reviewed to ensure they remain relevant to the Company's activities and to facilitate continual improvement and prevention of pollution.

Bronzeshield Lifting Ltd., shall ensure:

- Effective aspect and impact identification, assessment and control to avoid or reduce environmental risks to as low as reasonably practicable.
- Personnel are competent to fulfil their duties to the identified standards by providing adequate information, instruction, training and supervision.
- Consultation and communication with employees on environmental issues.
- Co-ordination and co-operation with all relevant stakeholders including clients, enforcing authorities, public as appropriate.
- Responsible procurement, use, transfer and disposal of work equipment, goods and materials.

Employees at every level of the Company are expected to take all reasonable steps to safeguard the environment and any other persons who may be affected by their acts or omissions whilst at work.

We will ensure that this Policy is communicated and available to all relevant stakeholders as appropriate.

The Policy shall be reviewed for effectiveness and suitability at least annually as part of the Management review process.

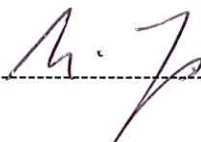
This Statement represents my commitment on behalf of the Company.

W.C.A. FROST
MANAGING DIRECTOR
BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021

M. JONES
FINANCE DIRECTOR
BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021

M. STEVENS
UK SALES DIRECTOR
BRONZESHIELD LIFTING LTD



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Alcohol and Drugs Policy

ALCOHOL & DRUGS POLICY STATEMENT ISSUED BY BRONZESHIELD LIFTING BOARD OF DIRECTORS

1. **INTRODUCTION:**

This statement sets out the Board's policy in respect of any employee whose proper performance of their duties is or maybe impaired as a result of drinking alcohol or taking drugs.

The Board has taken into account the Health & Safety at Work Act 1974, (Section 7). Provided that employees adhere to that part of the Act they will normally be able to demonstrate compliance to the Policy.

2. **POLICY:**

As part of the Bronzeshield Lifting's concern for health, safety and environment protection and as one of the leading Crane Companies in the Country, we are striving to "lead the way" in our policies and standards in corporate behaviour and as such calls for commitment from all of us.

Society and industry have become increasingly concerned about the dangers of drugs and alcohol abuse. Therefore, it is a requirement of the Board that no Employee, Staff Member or Sub-Contractor shall:

- a. Report or endeavour to report for work having just consumed alcohol or who are under the influence of drugs;
- b. Report for work in an unfit state due to the use of alcohol or drugs;
- c. Be in possession of drugs or alcohol in the work place;
- d. Consume alcohol or drugs whilst at work.

The Board will not tolerate any departure from these rules, Bronzeshield Lifting will take all reasonable steps to ensure that all Employees, Staff members, relevant persons (Safety Critical Work) and Sub-Contractors are made aware of the strict rules in line with the latest issue of:

Company Drugs and Alcohol Procedure, Railway Group Standards; Drugs and Alcohol Network Rail,

Appropriate disciplinary action in the event of any infringement from the laid down Policy will be taken.

Continued:

In addition, Bronzeshield Lifting will endeavour to ensure that at least 5% of all Employees/Staff Members who are a cross representation of our work force, including Sub-Contractors, shall be tested for the use and abuse of Drugs and Alcohol at unannounced random intervals. Individuals will be informed in writing of any results of Drug and Alcohol Testing.

Any person can be selected for screening to detect who takes Drugs and Alcohol before coming to work as Bronzeshield Lifting, will exercise "Due Diligence" and do all that is necessary to maintain safety and ensure that an offence is not committed.

Staff Employees will be subject to "For Cause" testing (accident and incident and behaviour) and can be selected at random to attend Drug and Alcohol screening in order to monitor safety and ensure an offence is not committed.

Bronzeshield Lifting will ensure, upon request, that information providing help and support to those with Drug and Alcohol problems will be made available to all personnel.

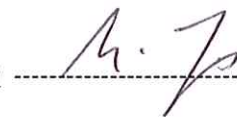
Bronzeshield Lifting are committed to providing a safe working environment in every sense, so that everyone can carry out their jobs, industrial role or function and fulfil their responsibilities unhindered.

W.C.A. FROST
MANAGING DIRECTOR
BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021

M. JONES
FINANCE DIRECTOR
BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021

M. STEVENS
UK SALES DIRECTOR
BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021



BRONZESHIELD LIFTING LTD

**Mobile Cranes, Heavy Haulage
Machinery Removals & Installations**



**Tel: 01322 555050
Fax: 01322 550099**



**Head Office & Accounts:
Crayford Mill
Thames Road
Crayford
Kent DA1 4QH**

Equal Opportunities Statement

Bronzeshield Lifting Ltd is committed to building an organisation that makes full use of the talents, skills, experience, and different cultural perspectives available in a multi-ethnic and diverse society, and where people feel they are respected and valued, and can achieve their potential regardless of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or age.

Bronzeshield Lifting Ltd will follow the recommendations of the CRE's *Statutory Code of Practice on Racial Equality in Employment* in all its employment policies, procedures and practices. We will also seek advice from the Equal Opportunities Commission regarding sexual equality at work, consult the Disability Rights Commission about disability in employment issues, and contact ACAS to ensure that we comply with age discrimination legislation.

Equal Opportunity Policy

The aims of this policy are to ensure that:

- No-one receives less favourable treatment, on grounds of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability or age; or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on any other grounds, or victimised for taking action against any form of discrimination or harassment, or instructed or put under pressure to discriminate against, or harass, someone on the above grounds.
- The organisation is free of unwanted conduct that violates the dignity of workers or creates an intimidating, hostile, degrading, offensive, or humiliating environment.
- Opportunities for employment, training and promotion are equally open to male and female candidates, candidates from all racial groups, candidates with or without disabilities, and candidates of any age.
- Selection for employment, promotion, transfer, training, and access to benefits, facilities and services, will be fair and equitable, and based solely on merit.

This policy applies to all aspects of employment, from recruitment to dismissal and former workers' rights.

We will take the following steps to put the policy into practice and make sure that it is achieving its aims:

1. The policy will be a priority for the organisation.
2. The Safety and Training Manager, Mr M. Lambourne, will be responsible for the day to day operation of the policy.



3. The policy will be communicated to all workers and job applicants, and will be placed on the company's intranet and website.
4. Workers and their representatives and trade unions will be consulted regularly about the policy, and about related action plans and strategies.
5. All workers will be trained on the policy, on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties. No-one will be in any doubt about what constitutes acceptable and unacceptable conduct in the organisation.
6. Managers and workers in key decision-making areas will be trained on the discriminatory effects that provisions, practices, requirements, conditions, and criteria can have on some groups, and the importance of being able to justify decisions to apply them.
7. Complaints about discrimination or harassment in the course of employment will be regarded seriously, and may result in disciplinary sanctions, and even dismissal. The complaints procedure will be published in a form that is easily accessible.
8. Opportunities for employment, promotion, transfer and training will be advertised widely, internally and externally, and all applicants will be welcomed, irrespective of race, colour, nationality, ethnic or national origins, gender, sexual orientation, disability or age.
9. All workers will be encouraged to develop their skills and qualifications, and to take advantage of promotion and development opportunities in the organisation.
10. Selection criteria will be entirely related to the job or training opportunity.
11. We will make reasonable changes to overcome physical and non-physical barriers that make it difficult for disabled employees to carry out their work, and for disabled customers to access our services.
12. We will take a flexible approach to working arrangements. We will consider requests for changes carefully and objectively, and will accommodate them unless it would cause significant difficulties to the business or the employee.
13. Information on the ethnic and racial background, gender, disability, and age of each worker and applicant for employment, promotion and training will be collected and analysed, to monitor each stage of the recruitment process. The information will be held in strictest confidence and will only be used to promote equality of opportunity.
14. If the data shows that people from a particular gender, racial group, or age band are under-represented in particular areas of work, lawful positive action training and encouragement will be considered for workers and others from that group, to improve their chances of applying successfully for vacancies in these areas.



BRONZESHIELD LIFTING LTD



15. Grievances, disciplinary action, performance assessment, and terminations of employment, for whatever reason, will also be monitored by gender, racial group, age, and disability.
16. Requirements, conditions, provisions, criteria, and practices will be reviewed regularly, in the light of the monitoring results, and revised if they are found to, or might, discriminate on any of the above grounds.
17. All contracts between Bronzeshield Lifting Ltd and contractors to supply goods, materials or services will include a clause prohibiting unlawful racial discrimination or harassment by contractors and their staff, and by any sub-contractors and their staff. The clause will also encourage contractors and potential contractors to provide equality of opportunity in their employment practices.
18. The effectiveness of the policy will be monitored regularly. A report on progress will be produced each year, and published via the intranet, the website, the staff newsletter, notice boards, and the annual report.
19. Customers and clients will be made aware of the policy, and of their right to fair and equal treatment, irrespective of race, colour, nationality, national or ethnic origins, sexual orientation, gender, disability or age.

This policy has been endorsed by The Managing Director and has the full support of the management / board.

The policy was approved on 31st July 2006 and revised in 2010 following consultation with senior managers, workers, workers' representatives, and trade unions.

Overall responsibility for the effectiveness of the policy lies with The Safety and Training manager. For more information, please contact this person:

**Bronzeshield Lifting Ltd, Crayford Mill, Thames Road, Crayford Kent,
DA1 4QH.**

W.C.A. FROST
MANAGING DIRECTOR

BRONZESHIELD LIFTING LTD

-----Date: 04th August 2021

M. JONES
FINANCE DIRECTOR

BRONZESHIELD LIFTING LTD

-----Date: 04th August 2021

M. STEVENS
UK SALES DIRECTOR

BRONZESHIELD LIFTING LTD

-----Date: 04th August 2021

The Bribery Act 2010

This policy statement provides a framework within which staff must operate to avoid committing an offence under the Bribery Act 2010 (the "Act").

The Act creates the following offences relevant to Bronzeshield Lifting.

- Paying bribes – it is an offence to offer, promise or give a bribe (so-called "active bribery")
- Receiving bribes – it is an offence to request, agree to receive or accept a bribe (so-called "passive bribery")

A person who is convicted of an offence of paying a bribe or receiving a bribe is liable on conviction to a maximum penalty of 10 years imprisonment and a fine or both.

A corporate offence is where a commercial organisation or associated person fails to prevent persons performing services on its behalf from committing bribery. Bronzeshield Lifting would be guilty of this offence if the person who performs a service on behalf of the organisation bribes another person intending:-

- (a) to obtain or retain business for Bronzeshield Lifting; or
- (b) to obtain or retain an advantage in the conduct of business for Bronzeshield Lifting.

If an organisation is found guilty of corporate bribery, both the organisation and its managers and/or directors could be subject to criminal sanctions. An "associated person" acting on behalf of the company could potentially include Bronzeshield Lifting Directors, staff, agents and sub-contractors.

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act dishonestly. Bribes can take on different shapes and forms and often both parties will benefit. A bribe can involve a direct or indirect promise or offer of something of value, the offer or receipt of a loan, fee or reward or other advantage and/or giving of aid, donations or voting with the intention of exerting improper influence.

Bronzeshield Lifting Ltd Policy Statement

It is Bronzeshield Lifting's policy to conduct its business in an open, honest and transparent way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. Bronzeshield Lifting is committed to adherence to the highest legal and ethical standards and this must be reflected in every aspect of the way in which we operate.

All staff will receive training which will enable them to be effective in the discharge of their responsibilities.

The company does not preclude the acceptance of hospitality, gifts or entertainment so long as they are reasonable. Limits are prescribed in the policy.

The acceptance or commission of a bribe is considered to be an act of gross misconduct and renders that member of staff liable to disciplinary action if found guilty.

Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals, invitations to events and functions in connection with matters relating to Bronzeshield Lifting business. These activities are acceptable provided they fall within reasonable bounds of occurrence and value. Routine inexpensive and very occasional gifts, entertainment and hospitality are acceptable whereas lavish or extraordinary gifts, entertainment and hospitality are not.

Before accepting or giving a gift, staff must always be aware as to the intent.

- Is it to build a relationship or is it something else?
- How would this look to the "reasonable man in the street"?

If you find it difficult to answer these questions there may be a risk involved and the risk could be unlawful. If you are in any doubt, in the first instance contact your line manager immediately.

Gifts, entertainment and hospitality that are never acceptable include where something is offered for something in return. Gifts of cash or cash convertible items are expressly prohibited.

Awarding a Contract for Goods or Services (Procurement)

Staff dealing with or using other parties must be aware of the possibility of being influenced to engage in or facilitate bribery. Staff could, for instance, receive excessive hospitality or gifts in order that they, on the company's behalf, give business to the other party. Staff must not accept any gift, hospitality or entertainment which is, or could be, construed as being designed to influence you in the performance of your job and/or to influence you to act dishonestly.

Modest entertainment or invitations to events as part of pre-contract negotiations are likely to be acceptable but in every event your line manager must be informed.

Donations

We do not make contributions to political organisations. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Managing Director.

Limits apply depending on the value (estimated or known) of the gift:

- Less than £25 – verbal agreement from your line manager.
- More than £25 and less than £250 – this must be declared in writing to the Operations Director
- More than £250 – the gift must not be accepted and the Managing Director informed. However, in exceptional circumstances, the Managing Director may take a view on the suitability of the gift and at his sole discretion, agree that the gift can be accepted.

Acceptance of a gift within these limits which has not been declared as required is considered to be an act of gross misconduct and renders that member of staff liable to disciplinary action if found guilty.

Media and Complaints

Any member of staff who is contacted by the media or is the subject of any complaint in respect of bribery allegations should report that immediately to the Managing Director so that a corporate response can be prepared.

Integrity of Staff

Bronzeshield Lifting recognises that a good standard of staff recruitment and vetting is important in order to reduce the risk of employing staff who are easily persuaded and/or willing to engage in corrupt practices, including bribery and fraud.

Training

Staff will receive regular training/briefings on the Act.

How to raise a Concern

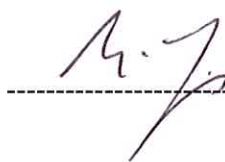
All staff have a responsibility to help detect, prevent and report instances not only of bribery but also of any other suspicious activity or wrongdoing. Bronzeshield Lifting is committed to ensuring that all staff have a safe, reliable and confidential way of reporting any suspicious activity. If any staff member has a concern regarding a suspected instance of bribery or corruption, they must notify the Managing Director.

W.C.A. FROST
MANAGING DIRECTOR
BRONZESHIELD LIFTING LTD



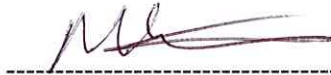
-----Date: 04th August 2021

M. JONES
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-----Date: 04th August 2021

M. STEVENS
UK SALES DIRECTOR
BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021

Smoke Free Policy Statement

PURPOSE

This policy has been developed to protect all employees, service users, customers and visitors from exposure to secondhand smoke and to assist compliance with the Health Act 2006. Exposure to secondhand smoke increases the risk of lung cancer, heart disease and other serious illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

POLICY

It is the policy of Bronzeshield Lifting Ltd that all our workplaces are smoke-free, and all employees have a right to work in a smoke-free environment. The policy came into effect on Sunday the 1st of July 2007 and will be reviewed annually by the undersigned. Smoking is prohibited in all enclosed and substantially enclosed premises in the workplace. This includes company vehicles. This policy applies to all employees, consultants, contractors, customers or members and visitors.

IMPLEMENTATION

Overall responsibility for policy implementation and review rests with the Managing Director, Mr W C A Frost. However, all staff are obliged to adhere to, and support the implementation of the policy.

The person named above shall inform all existing employees, consultants and contractors of the policy and their role in the implementation and monitoring of the policy. They will also give all new personnel a copy of the policy on recruitment/induction.

Appropriate 'no-smoking' signs will be clearly displayed at the entrances to and within the premises, and in all vehicles.

NON-COMPLIANCE

Local disciplinary procedures will be followed if a member of staff does not comply with this policy. Those who do not comply with the smoke-free law may also be liable to a fixed penalty fine and possible criminal prosecution.

HELP TO STOP SMOKING

The NHS offers a range of free services to help smokers give up.

Visit gosmokefree.co.uk or call the NHS Smoking Helpline on 0800 1690169 for details.

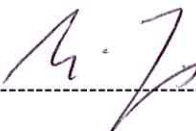
Alternatively you can text 'GIVE UP' and your full postcode to 88088 to find your local NHS Stop Smoking Service.

W.C.A. FROST
MANAGING DIRECTOR
BRONZESHIELD LIFTING LTD



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M. STEVENS
UK SALES DIRECTOR
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-----Date: 04th August 2021



BRONZESHIELD LIFTING LTD



Quality Policy Statement

Bronzeshield Lifting provides a first class crane rental service, either on a Contract Lift Basis or Hired and Managed, 24 hours a day, 365 days a year. We provide Mobile Telescopic Cranes with lifting capacities from 40 tonne - 500 tonne in addition to Mobile Tower and Spider Cranes.

Working together our highly qualified and expert planners and staff will ensure your lifting needs are met and the job runs smoothly to the highest safety standards.

In support of our aims and strategic direction and to demonstrate our commitment to quality, we operate a Quality Management System in accordance with the requirements BS EN ISO 9001:2015, the requirements of our customers and in accordance with our compliance obligations.

We will review the risks and opportunities to our business and set objectives against which our performance can be measured to identify opportunities for continual improvement of the Quality Management System and enhancing levels of customer satisfaction.

This Policy Statement will be reviewed annually as part of the Management Review process, to ensure its continued relevance and adequacy.

It is part of the company's training programme to ensure that this Policy Statement is briefed, understood and implemented at all levels within the company.

This policy will be available to interested parties via the company website.

W.C.A. FROST
MANAGING DIRECTOR
BRONZESHIELD LIFTING LTD

-----Date: 04th August 2021

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FINANCE DIRECTOR
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M. STEVENS
UK SALES DIRECTOR
BRONZESHIELD LIFTING LTD

-----Date: 04th August 2021

Form No: BQF3042

Issue No: 1

Date: 07/17

Bronzeshield Lifting Ltd
Data Protection and Data Security Policy

Statement and Purpose of Policy

- A.** Bronzeshield Lifting Ltd (the Employer) is committed to ensuring that all personal data handled by us will be processed according to legally compliant standards of data protection and data security.
- B.** We confirm for the purposes of the data protection laws, that the Employer is a data controller of the personal data in connection with your employment. This means that we determine the purposes for which, and the manner in which, your personal data is processed.
- C.** The purpose of this policy is to help us achieve our data protection and data security aims by:
1. notifying our staff of the types of personal information that we may hold about them, our customers, suppliers and other third parties and what we do with that information;
 2. setting out the rules on data protection and the legal conditions that must be satisfied when we collect, receive, handle, process, transfer and store personal data and ensuring staff understand our rules and the legal standards; and
 3. clarifying the responsibilities and duties of staff in respect of data protection and data security.
- D.** This is a statement of policy only and does not form part of your contract of employment. We may amend this policy at any time, in our absolute discretion.
- E.** For the purposes of this policy:
1. **Data protection laws** means all applicable laws relating to the processing of Personal Data including, for the period during which it is in force, the General Data Protection Regulation (Regulation (EU) 2016/679).
 2. **Data Subject** means the individual to whom the personal data relates.
 3. **Personal Data** means any information that relates to an individual who can be identified from that information.
 4. **Processing** means any use that is made of data, including collecting , storing, amending, disclosing or destroying it.
 5. **Special categories of personal data** means information about an individual's racial or Ethnic origin, political opinions, religious or philosophical beliefs, trade union membership Health, sex life or sexual orientation and biometric data.

Data protection principles

1. Staff whose work involves using personal data relating to Staff or others must comply with this policy and with the following data protection principles which require that personal information is:
 - a. **Processed lawfully, fairly and in a transparent manner.** We must always have a lawful basis to process personal data, as set out in the data protection laws. Personal data may be processed as necessary to perform a contract with the data subject, to comply with a legal obligation which the data controller is the subject of, or for the legitimate interest of the data controller or the party to whom the data is disclosed. The data subject must be told who controls the information (us), the purpose(s) for which we are processing the information and to whom it may be disclosed.
 - b. **Collected only for specified, explicit and legitimate purposes.** Personal data must not be collected for one purpose and then used for another. If we want to change the way we use personal data, we must first tell the data subject.
 - c. **Processed only where it is adequate, relevant and limited to what is necessary for the purposes of processing.** We will only collect personal data to the extent required for the specific purpose notified to the data subject.
 - d. **Accurate and the Employer takes all reasonable steps to ensure that information that is inaccurate is rectified or deleted without delay.** Checks to personal data will be made when collected and regular checks must be made afterwards. We will make reasonable efforts to rectify or erase inaccurate information.
 - e. **Kept only for the period necessary for processing.** Information will not be kept longer than it is needed and we will take all reasonable steps to delete information when we no longer need it. For guidance on how long particular information should be kept, contact the Data Protection Officer, or request a copy of our Data retention policy.
 - f. Secure and appropriate measures are adopted by the Employer to ensure as such.

Who is responsible for data protection and data security?

2. Maintaining appropriate standards of data protection and data security is a collective task shared between us and you. This policy and the rules contained in it apply to all staff of the Employer, irrespective of seniority, tenure and working hours, including all employees, directors and officers, consultants and contractors, casual or agency staff, trainees, homeworkers and fixed-term staff and any volunteers (Staff).
3. Questions about this policy, or requests for further information, should be directed to the Data Protection Officer.
4. All Staff have personal responsibility to ensure compliance with this policy, to handle all personal data consistently with the principles set out here and to ensure that measures are taken to protect the data security. Managers have special responsibility for leading by example and monitoring and enforcing compliance. The Data Protection Officer must be notified if this policy has not been followed, or if it is suspected this policy has not been followed, as soon as reasonably practicable.
5. Any breach of this policy will be taken seriously and may result in disciplinary action up to and including dismissal. Significant or deliberate breaches, such as accessing Staff or customer personal data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

What personal data and activities are covered by this policy?

6. This policy covers data:
 - a. which relates to a natural living individual who can be identified either from that information in isolation or by reading it together with other information we possess;
 - b. is stored electronically or on paper in a filing system;
 - c. in the form of statements of opinion as well as facts;
 - d. which relates to Staff (present, part or future) or to any other individual whose personal data we handle or control;
 - e. which we obtain, is provided to us, which we hold or store, organise, disclose or transfer, amend, retrieve, use, handle, process, transport or destroy.
7. This personal data is subject to the legal safeguards set out in the data protection laws.

What personal data do we process about Staff?

8. We collect personal data about you which:
 - a. you provide or we gather before or during your employment with us;
 - b. is provided by third parties, such as references or information from suppliers or another party that we do business with; or
 - c. is in the public domain.
9. The types of personal data that we may collect, store and use about you include records relating to your;
 - a. Home address, contact details and contact details for your next of kin;
 - b. Recruitment (including your application form or curriculum vitae, references received and details of your qualification);
 - c. Pay records, national insurance number and details of taxes and any employment benefits such as pension and health insurance (including details of any claims made);
 - d. Telephone, email, internet, fax or instant messenger use;
 - e. Performance and any disciplinary matters, grievances, complaints or concerns in which you are involved.

Sensitive personal data

10. We may from time to time need to process sensitive personal information (sometimes referred to as 'special categories of personal data').
11. We will only process sensitive personal information if:
 - a. We have a lawful basis for doing so, eg it is necessary for the performance of the employment contract; and
 - i the data subject has given explicit consent.
 - ii the processing is necessary for the purposes of exercising the employment law rights or obligations of the Company or the data subject.
 - iii the processing is necessary to protect the data subject's vital interests, and the data subject is physically incapable of giving consent.
 - iv processing relates to personal data which are manifestly made public by the data subject.
 - v the processing is necessary for the establishment, exercise, or defence or legal claims; or
 - vi the processing is necessary for reasons of substantial public interest.
12. Before processing any sensitive personal information, Staff must notify the Data Protection Officer of the proposed processing, in order for the Data Protection Officer to assess whether the processing complies with the criteria noted above.
13. Sensitive personal information will not be processed until the assessment above has taken place and the individual has been properly informed of the nature of the processing, the purposes for which it is being carried out and the legal basis for it.
14. Our privacy notice sets out the type of sensitive personal information that we process, what it is used for and the lawful basis for the processing.

How we use your personal data

15. We will tell you the reasons for processing your personal data, how we use such information and the legal basis for processing in our privacy notice. We will not process Staff personal information for any other reason.
16. In general, we will use information to carry out our business, to administer your employment or engagement and to deal with any problems or concerns you may have, including, but not limited to:
 - a. **Staff Address Lists:** to compile and circulate lists of home address and contact details, to contact you outside working hours.
 - b. **Sickness records:** to maintain a record of your sickness absence and copies of any doctor's notes or other documents supplied to us in connection with your health, to inform your colleagues and others that you are absent through sickness, as reasonably necessary to manage your absence, to deal with unacceptably high or suspicious sickness absence, to inform reviewers for appraisal purposes of your sickness absence level, to publish internally aggregated, anonymous details of sickness absence levels.

- c. **Monitoring IT systems:** to monitor your use of e-mails, internet, telephone and fax, computer or other communications or IT resources.
- d. **Disciplinary, grievance or legal matters:** In connection with any disciplinary, grievance, legal, regulatory or compliance matters or proceedings that may involve you.
- e. **Performance Reviews:** to carry out performance reviews.
- f. **Equal Opportunities Monitoring:** to conduct monitoring for equal opportunities purposes and to publish anonymised, aggregated information about the breakdown of the Employer's workforce.

Accuracy and relevance

17. We will:

- a. Ensure that any personal data processed is up to date, accurate, adequate, relevant and not excessive, given the purpose for which it was collected.
- b. Not process personal data obtained for one purpose for any other purpose, unless you agree to this or reasonably expect this.

18. If you consider that any information held about you is inaccurate or out of date, then you should tell the Data Protection Officer. If they agree that the information is inaccurate or out of date, then they will correct it promptly. If they do not agree with the correction, then they will note your comments.

Storage and retention

- 19. Personal data (and sensitive personal information) will be kept securely in accordance with our Data retention policy.
- 20. The periods for which we hold personal data are contained in our privacy notices.

Individual rights

21. You have the following rights in relation to your personal data.

22. Subject access requests:

- a. You have the right to make a subject access request. If you make a subject access request, we will tell you:
 - i. Whether or not your personal data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from you;
 - ii. To whom your personal data is or may be disclosed.
 - iii. For how long your personal data is stored (or how that period is decided);
 - iv. Your rights of rectification or erasure of data, or to restrict or object to processing;
 - v. Your right to right to complain to the Information commissioner if you think we have failed to comply with your data protection rights; and
 - vi. Whether or not we carry out automated decision making and the logic involved in any such decision making.
- b. We will provide you with a copy of the personal data undergoing processing. This will normally be in electronic form if you have made a request electronically, unless you agree otherwise.
- c. To make a subject access request, contact us at martin@bronzeshield.com.
- d. We may need to ask for proof of identification before your request can be processed. We will let you know if we need to verify your identity and the documents we require.
- e. We will normally respond to your request within 28 days from the date your request is received. In some cases, eg where there is a large amount of personal data being processed, we may respond within 3 months of the date your request is received. We will write to you within 28 days of receiving your original request if this is the case.
- f. If your request is manifestly unfounded or excessive, we are not obliged to comply with it.

23. Other rights:

- a. You have a number of other rights in relation to your personal data. You can require us to:
 - i. Rectify inaccurate data;

- ii. stop processing or erase data that is no longer necessary for the purposes of processing;
 - iii. stop processing or erase data if our interests override our legitimate grounds for processing the data (where we rely on our legitimate interests as a reason for processing data);
 - iv. stop processing data for a period if data is inaccurate or if there is a dispute about whether or not your interests override the Employer's legitimate grounds for processing the data.
- b. To request that we take any of these steps, please send the request to martin@bronzeshiels.com.

Data security

- 24. We will use appropriate technical and organisational measures to keep personal data secure, and in particular to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- 25. Maintaining data security means making sure that:
 - a. Only people who are authorised to use the information can access it;
 - b. Where possible, personal data is pseudonymised or encrypted;
 - c. Information is accurate and suitable for the purpose for which it is processed; and
 - d. Authorised persons can access information if they need it for authorised purposes.
- 26. By law, we must use procedures and technology to secure personal information throughout the period that we hold or control it, from obtaining to destroying the information.
- 27. Personal information must not be transferred to any person to process (eg while performing services for us on our behalf), unless that person has either agreed to comply with our data security procedures or we are satisfied that other adequate measures exist.
- 28. Security procedures include:
 - a. Any desk or cupboard containing confidential information must be kept locked.
 - b. Computers should be locked with a strong password that is changed regularly or shut down when they are left unattended and discretion should be used when viewing personal information on a monitor to ensure that it is not visible to others.
 - c. Data stored on CDs or memory sticks must be encrypted or password protected and locked away securely when they are not being used.
 - d. The Data Protection Officer must approve of any cloud used to store data.
 - e. Data should never be saved directly to mobile devices such as laptops, tablets or smartphones.
 - f. All servers containing sensitive personal data must be approved and protected by security software.
 - g. Servers containing personal data must be kept in a secure location, away from general office space.
 - h. Data should be regularly backed up in line with the Employer's back-up procedure.
- 29. Telephone Precautions. Particular care must be taken by Staff who deal with telephone enquiries to avoid inappropriate disclosures. In particular:
 - a. The identity of any telephone caller must be verified before any personal information is disclosed;
 - b. If the caller's identity cannot be verified satisfactorily then they should be asked to put their query in writing.
 - c. Do not allow callers to bully you into disclosing information. In case of any problems or uncertainty, contact the Data Protection Officer.
- 30. Methods of disposal. Copies of personal information, whether on paper or on any physical storage device, must be physically destroyed when they are no longer needed. Paper documents should be shredded and CDs or memory sticks or similar must be rendered permanently unreadable.
- 31. Additional measures to ensure data security include employee personal information shall not be divulged or discussed by telephone or email without the express permission of the employee.

Data impact assessments

32. Some of the processing that the Employer carries out may result in risks to privacy.
33. Where processing would result in a high risk to Staff rights and freedoms, the Employer will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purpose for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.

Data breaches

34. If we discover that there has been a breach of Staff personal data that poses a risk to the rights and freedoms of individuals, we will report it to the Information Commissioner within 72 hours of discovery.
35. We will record all data breaches regardless of their effect in accordance with our Breach response policy.
36. If the breach is likely to result in a high risk to your rights and freedoms, we will tell affected individuals that there has been a breach and provide them with more information about its likely consequences and the mitigation measures it has taken.

Individual responsibilities

37. Staff are responsible for helping the Employer keep their personal data up to date.
38. Staff should let the Employer know if personal data provided to the Employer changes, eg if you move house or change your bank details.
39. You may have access to the personal data of other Staff members and of our customers in the course of your employment. Where this is the case, the Employer relies on Staff members to help meet its data protection obligations to Staff and to customers.
40. Individuals who have access to personal data are required;
 - a. To access only personal data that they have authority to access and only for authorised purposes;
 - b. Not to disclose personal data except to individuals (whether inside or outside of the Employer) who have appropriate authorisation;
 - c. To keep personal data secure (eg by complying with rules on access to premises, computer access, including password protection and secure file storage and destruction);
 - d. Not to remove personal data, or devices containing or that can be used to access personal data, from the Employer's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
 - e. Not to store personal data on local drives or on personal devices that are used for work purposes.

Training

41. We will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter.
42. Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy will receive additional training to help them understand their duties and how to comply with them.

W.C.A. FROST

MANAGING DIRECTOR

BRONZESHIELD LIFTING LTD

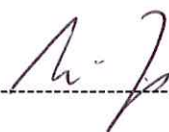


-----Date: 04th August 2021

M. JONES

FINANCE DIRECTOR

BRONZESHIELD LIFTING LTD

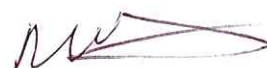


-----Date: 04th August 2021

M. STEVENS

UK SALES DIRECTOR

BRONZESHIELD LIFTING LTD



-----Date: 04th August 2021