
BCR Infinity Architects GDPR Data Privacy Policy

- 1.0** BCR Infinity Architects is registered with the Information Commissioner's Office (ICO) as a data controller under registration number ZA581688.
- 2.0** BCR Infinity Architects needs to keep and process data about people. The information we hold and process will be used for our management and administrative use only. We will keep and use information to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately during the recruitment process, whilst you are working with us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings.
- 3.0** BCR Infinity Architects is committed to protecting your privacy and complying with the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA).
- 4.0** As a company pursuing Architecture and Design activities, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes.
- 5.0** This Policy sets out the basis by which we collect, use and disclose the Personal Data of our Employees, as well as your rights in respect of such Personal Data. From time to time, we will ask you to confirm or amend your Personal Data to make sure that it is kept up to date.
- 6.0** We may update this Privacy Policy from time to time, and we will issue an up-to-date copy of the Privacy Policy in this event.

7.0 How We Collect Personal Data

7.1 We may collect Personal Data in a number of ways, for example:

- The information we hold will have been provided by individuals, but some may come from other internal sources, such as the Directors/ immediate Manager, or in some cases, external sources, such as referees.
- When an individual contacts us either via telephone or e-mail.
- When an individual registers with us for recruitment and vacancy purposes.
- When an individual applies for a vacancy internally or externally.
- When we collect data through the implementation of any HR Employee Relations Policies, eg Disciplinary or Health and Safety purposes.
- In the course of managing employment with BCR Infinity Architects, for example PDR or Payroll purposes.
- Contact details you provide for the Company's internal Quality Assurance Directory.
- When we receive your Personal Data from third parties, for example security screening and recruitment agencies.

8.0 What is Personal Data

8.1 Personal Data is data that relates to an identified or identifiable individual and is:

- Processed electronically
- Kept in a filing system
- Part of an accessible record, for example an education record
- Data held by a Public Authority

8.2 This includes data that does not name an individual but could potentially identify them. For example, a payroll or staff number.

9.0 What Type of Personal Information do we Collect?

9.1 We process Personal Data relating to those we employ to work as, or are otherwise engaged to work as, part of BCR Infinity Architects. We do this for employment purposes to assist in the running of the Company and/or to enable individuals to be paid. We may collect personal data for the purpose of recruitment. Any information collated will be deleted if the person is not recruited.

9.2 Personal information can include the following:

- Your title, forenames, surname and gender.
- Your personal or work-related e-mail address.
- Your personal or work-related contact details, such as your telephone numbers(s), mobile numbers and postal address.
- Your date of birth and National Insurance Number.
- Your marital status.
- Your residential status and address details.
- Your occupation, salary and annual income information.
- Your employment status.
- Your employer details and time periods in that occupation and with that employer and any other employers within a 3-year period.
- Your bank details, including your bank name, address, sort code, account number, account type.
- Information necessary for legal compliance.
- Where you “like” us or make posts on our pages on social networking websites, such as LinkedIn, Facebook, Twitter, You Tube and Instagram.
- Your Right to Work documentation and other security screening information.

9.3 Some of the information we collect about you may include Sensitive Personal Data as defined in the Data Protection Act. We will not utilise this data unless we have your consent.

9.4 Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency.

10.0 Using the Information we Collect?

10.1 We may use your Personal Data in the following ways:

- To deal with any employee/employers related disputes that may arise.
- For assessment and analysis purposes to help improve the operation of and manage the performance of the business.
- To prevent, detect and prosecute fraud and other crime.
- For any other purpose for which you give us your consent to use Personal Data.
- To comply with legal obligations eg HMRC, pensions, reference requests.

- Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay.

11.0 We May Share Your Personal Data

- 11.1** We may share your Personal Data with our agents and/or professional advisors (RIBA, ARB).
- 11.2** We may share your Personal Data where we are under a legal obligation to do so, for example where we are required to share information under statute, to prevent fraud and other criminal offences or because of a Court Order for example HRMC, the police.

12.0 Your Rights

- 12.1** You have the right to request from us access to and rectification or erasure of your Personal Data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.
- 12.2** If you have provided consent for the processing of your data, you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
- 12.3** You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or Data Protection Act regarding your Personal Data.
- 12.4** Your data will not be used for marketing purposes unless we have your consent.
- 12.5** Please let us know if the Personal Data that we hold about you needs to be updated on a Personnel Information form.

13.0 Security

- 13.1** The security of your Personal Data is very important to us.
- 13.2** We will ensure that we have in place appropriate technical and organisational measures to prevent unauthorised or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to Personal Data.
- 13.3** All personal paper-based documentation is kept in separate locked files that cannot be accessed by employees of the company. Computer based Personal Data files are kept on the Company's computer system in an encrypted location. These files are restricted to IT administrators, Human Resources and the Directors.
- 13.4** In limited and necessary circumstances, your information may be transferred outside of the European Economic Area (EEA) or to an international organisation to comply with our legal or contractual requirements. We have in place safeguards for this to ensure safe and secure processes.

14.0 Identity and Contact Details of the Data Protection Manager

14.1 BCR Infinity Architects is the controller of data for the purposes of the Data Protection Act (DPA) and General Data Protection Regulation (GDPR).

14.2 If you have any concerns as to how your data is processed, you can contact:

Chris Jones, Director	chris@bcr-infinityarchitects.co.uk
Aoife O'Gorman, Director	aoife@bcr-infinityarchitects.co.uk
Jayne Baker-Wood, HR	jayne@bcr-infinityarchitects.co.uk

15.0 Monitoring and Review

15.1 The policy will be monitored and subject to formal annual review by the Company Directors.

Signature:
Aoife O'Gorman



Position: Director

Date: 16 June 2026

Signature:
Christopher Jones



Position: Director

Date: 16 June 2026

Policy Review Date: 15 June 2027