

JCA is committed to complying with its legal obligations under the General Data Protection Regulation 2016/679 (“GDPR”), the UK GDPR, and the Data Protection Act 2018 for the protection of the rights and freedoms of individuals whose personal data JCA obtains or generates as part of its business operations. You can read more about how JCA uses your data when you visit the JCA Engineering Limited website (www.jca.co.uk).

In this notice, “we”, “us”, and “our” means JCA, a service provided by Mitie Group plc. “User” means an individual user of the ININDEX system. This privacy notice tells you how and why we collect, store and use your personal information, and provides information about individuals' rights. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

1.0 What Personal Data do we Collect and Process?

We will only process personal data where we have a lawful basis on which to do so. The lawful basis on which data is processed will depend on the nature of the information collected and the purposes for which we use it, but will be one or more of the following:

- **Consent:** you have provided your consent for us to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with us or because you have asked us to take specific steps before entering a contract.
- **Legal obligation:** the processing is necessary for us to comply with our legal obligations.
- **Vital interests:** the processing is necessary to protect someone’s life.
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party. Where we use legitimate interests as our lawful basis, we have assessed the processing's necessity, proportionality, and reasonability.

2.0 How we use your Data:

Purposes	Data Types	Lawful Bases of Processing	Who this Personal Data is shared with
To identify individuals.	Name, address, email, phone number, NI number, DOB, Gender and driving license.	Legitimate Interest	JCA
To verify individuals’ identities and control access to site.	Biometric data* – images.	Consent (please see Page 6)	JCA
To ensure correct qualifications are in place to comply with Health and Safety regulations.	Competencies and qualifications.	Legal Obligation	JCA
To take necessary action in the case of an emergency.	Next of kin contact details and relevant medical information.	Legitimate Interest	JCA

3.0 *Biometric data

Your facial image and fingerprint is biometric data, which is classified as sensitive. We only use it for identity verification purposes on this system with your consent. This ensures we maintain a secure workplace and only authorized individuals gain access to a specific site. This data is deleted two years post contract.

4.0 How Long will we Keep your Personal Data?

We keep your personal details for as long as necessary for the reasons we are using them, and this will vary depending on our relationship with you. Your personal data will be deleted when no longer required, including where an individual leaves a project or organisation or where consent is withdrawn (where applicable).

5.0 Data Security and Integrity

JCA is committed to ensuring your data is kept secure from loss, misuse or alteration. We use technical, physical, and organisational security measures and comply with ISO27001 standards to keep your data secure. We store all information provided on secure servers.

JCA uses the ININDEX system to collect and maintain your personal information, who use encrypted storage, access controls to limit who has access to your data, logging and monitoring, and firewalls.

6.0 Disclosure of your Information

We may disclose your personal information (not including biometric data) to any member of our group, which means Mitie Group plc, its subsidiaries, and subsidiary undertakings from time to time (as defined in the Companies Act 2006).

We may also share or disclose your personal information to third parties in certain circumstances:

- We may provide personal data to clients, third-party suppliers, service providers, professional advisors, and other business partners to enable us to provide or receive products or services.
- In connection with the administration and operation of our business we may provide personal data to third parties who provide support services including IT, finance and accounting, and HR services and research, marketing, business development, and consultancy services.
- If we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.
- We may disclose or share your personal data if we are under a duty to do so to comply with any legal obligation or, where necessary, to enforce any legal right or contractual agreement, or to protect the rights, property, or safety of Mitie, our employees, Clients, or others. This includes exchanging information with other companies, organisations, and bodies for the purposes of fraud protection and credit risk reduction.

If you want to know more about how we share your data, please email us at Privacy@mitie.com .

7.0 Changes to our Privacy Notice

This Privacy Notice was last updated in October 2025. Any changes we may make to our Privacy Notice in the future will be posted on this page, and we suggest that you check back frequently to see any updates or changes.

8.0 Your Rights

You have certain rights which you can exercise if we are processing your personal data:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right of erasure** – you have a right, in certain circumstances, to ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply, you have a right to restrict the processing of your personal data.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing, such as direct marketing.

To exercise these rights, please contact us using the details given in this Privacy Notice or at privacy@mitie.com

9.0 Contact Information

If you wish to make a complaint about how your personal data is being processed by us (or the third parties referred to in this Privacy Notice), or how your complaint has been handled, you have a right to lodge a complaint with our Data Protection Officer using the following contact details or by contacting privacy@mitie.com.

If you have any questions about this Privacy Notice or your rights, you can contact us using the following details:

Data Protection Officer

Mitie Group plc
Level 12, The Shard
32 London Bridge Street
London SE1 9SG

You can also email us at:

Privacy@mitie.com

You have the right to complain to the Information Commissioner's Office (ICO). You can visit the [ICO website](https://ico.org.uk) for more information. Alternatively, you can contact them by post:

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow

Cheshire

SK9 5AF