

Site Access Privacy Policy

Thomas Johnstone Ltd is committed to protecting your personal information and respecting your privacy. This Privacy Policy explains how we collect, use, and protect personal data of anyone entering our construction sites, including visitors, subcontractors, delivery personnel, clients, and others. We may update this notice from time to time. Please review it periodically for the latest version at www.tjl.com.

Contact Details

Data Controller:

Thomas Johnstone Ltd
Cartside Avenue
Inchinnan Business Park
Renfrewshire PA4 9RU

Data Protection Officer:

David Haddow, Joint Managing Director
Thomas Johnstone Ltd
Cartside Avenue
Inchinnan Business Park
Renfrewshire PA4 9RU
Email: DPO@tjl.com

Lawful Basis for Processing

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The lawful bases we rely on include:

- Legal Obligation (Article 6(1)(c)) – to comply with health & safety, security, and employment laws.
- Legitimate Interests (Article 6(1)(f)) – to protect our sites, personnel, and assets.
- Vital Interests (Article 6(1)(d)) – to ensure your safety in the event of an emergency.

Where we process special category data (e.g. health information), this is done under:

- Article 9(2)(b) – necessary for employment, social security, and social protection law.
- Article 9(2)(c) – necessary to protect vital interests of individuals.

Information We Collect

When you access one of our sites, we may collect the following types of personal data:

- Identity Details – Full name, company name, job title, identification documents.

- Contact Details – Phone number, email, emergency contact.
- Access Records – Date and time of entry/exit, vehicle registration, access control data.
- Health & Safety Records – Site induction records, training or certification records, relevant health information.
- Visual Data – Photographs and CCTV footage for safety and security monitoring.
- Drug & Alcohol Testing Data – consent forms, test results, correspondence relating to testing outcomes, and records of site access restrictions based on test results.

Why We Collect Your Information

We process your data for the following purposes:

- To ensure the safety and security of all individuals on-site.
- To confirm identity and authorisation for site access.
- To comply with legal and contractual obligations.
- To maintain accurate records for emergency response, audits, and investigations.
- To monitor site traffic and manage personnel.
- To ensure compliance with substance misuse policies, including drug and alcohol rules.
- To investigate potential breaches and manage site access decisions.
- To retain evidence in case test results or access decisions are disputed.

We do not use your data for marketing purposes.

CCTV and Monitoring

Our sites are monitored by CCTV for safety, security, and crime prevention. Signs are displayed to notify you of recording. CCTV footage is generally retained for 30–90 days, unless required for investigations or legal purposes.

Drug & Alcohol Testing

In certain circumstances, individuals may be subject to drug and alcohol testing in line with our substance misuse policy.

- Collection: Testing is carried out by Occupational Health providers. Individuals are asked to sign a consent form before any test is conducted.
- Testing process:
 - If the test result is negative, the urine sample is disposed of immediately.
 - If the test result is non-negative, the individual signs a second consent form and the sample is sent under chain of custody to an accredited laboratory for confirmation.
- Retention:
- Consent forms – held by the Occupational Health provider for 4 years, then securely shredded.
- Lab samples – retained by the laboratory for 1 year, then destroyed.

- TJL records (including test results, related correspondence, and access decisions) – retained for 4 years. Certain correspondence (e.g. site access restriction notices) may be kept longer where necessary to enforce safety rules.
- Lawful Basis:
 - Article 6(1)(c) – legal obligation (health & safety compliance).
 - Article 6(1)(f) – legitimate interests (maintaining a safe workplace).
 - Article 9(2)(b) and 9(2)(c) – processing of special category health data for employment and vital interest reasons.

Information Sharing

We do not sell or share your data for marketing. We may share information in the following cases:

- Service Providers – with trusted third parties (e.g. security contractors, site management systems) who process data on our behalf under strict agreements.
- Legal Requirements – if required by law, regulation, or by public authorities.
- Corporate Transactions – if Thomas Johnstone Ltd undergoes a merger or acquisition, we will ensure your data remains protected.

All processing is carried out in the UK. If any data transfer outside the UK were to occur, we would ensure appropriate safeguards are in place.

Data Retention

We only keep your personal data for as long as necessary:

- Sign-in and access records (turnstile logs) – retained for the duration of the project and for 3 years after completion, then securely shredded.
- Site induction records – retained for the duration of the project and for 3 years after completion, then securely shredded.
- CCTV footage – typically 30–90 days, unless required for an investigation.
- Drug & alcohol testing records (consent forms, results, correspondence) – retained for 4 years, with certain correspondence (e.g. access restriction notices) retained longer if necessary for site safety enforcement.
- Health & safety and training records – retained as required by law or contract.

After these periods, data is securely deleted or destroyed.

Your Rights

Under UK GDPR, you have the right to:

- Access your personal data.
- Request correction or deletion.
- Object to or restrict processing.

- Request data portability (where applicable).
- Withdraw consent (where processing is based on consent).

To exercise these rights, contact our DPO at DPO@tjl.com or submit a request via our web portal: <http://portal.tjl.com/External/>.

If you are dissatisfied with our handling of your data, you may contact the Information Commissioner's Office (ICO) at www.ico.org.uk.

Information Security

We use appropriate technical and organisational measures to protect your data against unauthorised access, alteration, disclosure, or destruction. All data breaches are recorded and investigated in line with our internal Data Security Process.

Signed:



Name: David Hadow

Position: Joint Managing Director

Date: 18 September 2025

Signed:



Name: Rod Young

Position: Joint Managing Director

Date: 18 September 2025