
ATA Timber UK Limited

34-36 Crouch Street Colchester CO3 3HH

Combined Policy Statements

Privacy Notice.....	2
GDPR - Processing Data	4
Anti-Bribery & Corruption Policy – Bribery Act 2010	6
Modern Slavery Act 2015	7
Equality, Diversity & Inclusion – Equality Act 2010	8
PEFC Commitment Statement	9
Employment & Labour Policy	10
Health & Safety Policy Statement.....	14

Privacy Notice

The Company respects the privacy of all third parties that it has a relationship with and is committed to protecting personal data. This privacy notice will inform you as to how we look after your personal data (in all situations where we collect your data) and tell you about your privacy rights and how the law protects you.

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how the Company collects and processes your personal data.

CONTROLLER

ATA Timber UK Ltd is the controller and responsible for your personal data (collectively referred to as “COMPANY”, “we”, “us” or “our” in this privacy notice).

We have appointed a Data Protection Manager (DPMs) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please write to the DPMs using the details set out below.

Data Protection Manager (DPM)
ATA Timber UK Ltd

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We collect and use personal data to run our business and provide services to our customers.

What Data We Collect

We may collect:

- Customer data – name, contact details, payment information, correspondence.
- Employee data – name, address, payroll details, tax information.
- Supplier data – business contact details, invoices, contracts.
- Marketing data – email addresses, consent records, enquiry details.

How We Use Your Data

We use personal data to:

- Provide our services and manage contracts.
- Process payments and maintain financial records.
- Communicate with customers, suppliers, and staff.
- Meet legal and regulatory obligations (e.g., HMRC).
- Send marketing communications (only with consent).

Legal Basis

We process data under the following lawful bases:

- Contract – to deliver our services.
- Legal obligation – to meet tax and employment laws.
- Consent – for marketing communications.
- Legitimate interests – to run and improve our business.

How Long We Keep Data

- Employee and financial records: 6 years.
- Customer contracts: 6 years after they end.
- Marketing data: 2 years or until consent is withdrawn.
- General communications: 2 years.

Sharing Data

We do not sell personal data. We may share it with:

- HMRC and other regulators (where required).
- Professional advisers (accountants, legal).
- Trusted service providers (e.g., IT support, payroll).

Your Rights

Under UK GDPR, you have the right to:

- Access your data.
- Correct inaccurate data.
- Request deletion of data.
- Withdraw consent (for marketing).
- Complain to the Information Commissioner's Office (ICO).

Contact Us

If you have questions or want to exercise your rights, contact: DPM ATA Timber UK Ltd.

GDPR - Processing Data

The Company, is, as at the edition date of this notice, the “controller” in respect of your personal data for the purposes of EU General Data Protection Regulation (GDPR) No. 2016/679 of 27 April 2016 (referred to below as **EU GDPR**). Post 11pm on 31 December 2020 when the BREXIT transition period ended, the Company will be the “controller” for the purposes of UK GDPR, which is EU GDPR as this forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and is amended by The Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (referred to below as **UK GDPR**).

Processing Activities

This Policy of Processing Activities (Record) describes how the Company collects and uses personal data.

Data Controller Details:

Data Protection Manager (DPM)
ATA Timber UK Ltd

Data Retention Policy

This policy explains how we manage, store, and delete personal and business data. As a small company, we only keep data for as long as necessary to meet legal, contractual, or business needs.

Scope

This policy applies to:

- All employees, contractors, and directors.
- All personal data we collect (customers, suppliers, employees).
- All business records (financial, operational, communications).

Principles

We follow these principles:

- Minimal retention – keep data only as long as needed.
- Secure storage – protect data from loss or misuse.
- Lawful disposal – delete or destroy data safely when no longer required.
- Transparency – inform individuals how long their data is kept.

Retention Periods

Data Type	Retention Period	Reason
Employee records (contracts, payroll, tax)	6 years after employment ends	Legal requirement (HMRC, employment law)
Financial records (invoices, receipts, accounts)	6 years	HMRC compliance
Customer contracts & correspondence	6 years after contract ends	Legal claims limitation period
Marketing data (email lists, enquiries)	2 years or until consent withdrawn	GDPR consent rules
General emails & communications	2 years	Business reference
Supplier contracts & invoices	6 years	HMRC compliance

Secure Disposal

- Paper records: shredded.
- Digital records: permanently deleted from systems and backups.
- Access revoked immediately when data is no longer needed.

Responsibilities

- The Company Director is responsible for ensuring compliance.
- All staff must follow this policy when handling data.

Review

This policy will be reviewed annually or sooner if legislation changes.

Data Processing

We process personal data only for clear business purposes. As a small company, the types of data we may process include:

- Employee Data – names, addresses, payroll details, tax information, emergency contacts.
- Customer Data – names, contact details, contracts, payment information, correspondence.
- Supplier Data – business contact details, invoices, contracts, payment records.
- Marketing Data – email addresses, consent records, enquiry details.
- Operational Data – general business communications, project files, scheduling information.

All data is processed lawfully, fairly, and transparently. We do not collect more information than necessary, and we only use it for the purpose for which it was provided.

Data Security

We take the security of personal and business data seriously. To protect information from loss, misuse, or unauthorised access, we apply the following measures:

- Access Control – Only authorised staff have access to personal data, and access is limited to what they need for their role.
- Password Protection – All devices and accounts are secured with strong, unique passwords.
- Secure Storage – Paper records are kept in locked storage; digital records are stored on secure systems with encryption where possible.
- Regular Backups – Important data is backed up securely to prevent loss.
- Device Security – Company laptops and phones are kept updated with security patches and antivirus protection.
- Safe Sharing – Data is only shared with trusted third parties when necessary and under appropriate agreements.
- Training & Awareness – Staff are reminded of their responsibilities for keeping data safe.

We will report any data breaches in line with UK GDPR requirements and notify the Information Commissioner's Office (ICO) and affected individuals where legally required.

Anti-Bribery & Corruption Policy – Bribery Act 2010

Commitment

The Company is committed to conducting business in an honest and ethical manner. We have a zero-tolerance approach to bribery and corruption and are dedicated to acting professionally, fairly, and with integrity in all our business dealings and relationships.

We will:

- Prohibit all forms of bribery and corruption.
- Comply with the UK Bribery Act 2010 and all relevant laws.
- Maintain transparency in our dealings with customers, suppliers, and partners.
- Encourage reporting of any concerns without fear of retaliation.

Scope

This statement applies to:

- All employees, directors, and contractors.
- Any third parties acting on behalf of the Company.
- All business activities, whether in the UK or abroad.

What is Bribery?

Bribery means offering, giving, receiving, or soliciting something of value to influence the actions of another person. Examples include:

- Cash payments or gifts intended to secure business.
- Excessive hospitality or entertainment.
- Kickbacks or facilitation payments.

Gifts and Hospitality

- Modest, reasonable, and proportionate gifts or hospitality may be acceptable if they are customary and not intended to influence decisions.
- Any gift or hospitality must be recorded and approved by the Director.

Responsibilities

- The **Company Directors** are responsible for ensuring compliance with this statement.
- All staff must avoid any activity that could lead to, or suggest, a breach of this policy.
- Concerns should be reported immediately to a Director.

Consequences of Breach

- Breaches of this statement may result in disciplinary action, up to and including dismissal.
- Serious breaches may be reported to the authorities and could result in criminal prosecution.

Review

This statement will be reviewed annually to ensure it remains appropriate for the size and nature of our business.

Modern Slavery Act 2015

Commitment

The Company is not legally required to publish a Modern Slavery Statement under the Modern Slavery Act 2015. However the Company recognises the importance of upholding human rights and preventing modern slavery and human trafficking in all forms.

The Company is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or any part of its business and operates a zero-tolerance policy in this regard. The Company recognises and upholds the Modern Slavery Act 2015 as a tool to combating the egregious and widespread human rights abuses comprised in modern slavery.

Defining Modern Slavery

Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.

We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.

You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.

Preventing Modern Slavery

We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.

We are committed to:

- Ensuring that modern slavery and human trafficking have no place in our business or supply chains.
- Acting ethically and with integrity in all our business relationships.
- Expecting the same high standards from our suppliers and partners.

Practical steps we take include:

Working only with reputable suppliers and service providers. Suppliers of goods or services, must assess their business and supply chains to confirm they:

- Comply with your legal obligations, in relation to Modern Slavery; and
- Are committed to ensuring there is no Modern Slavery taking place in their business, or in any of your supply chains.

Suppliers must also provide a copy of their anti-slavery policy on request from us.

- Including ethical considerations when choosing suppliers.
- Remaining alert to any risks of modern slavery in our operations.
- Encouraging staff to report concerns immediately to the Director.

This statement will be reviewed annually to ensure it remains relevant and proportionate to our business activities.

Equality, Diversity & Inclusion – Equality Act 2010

Commitment

The Company is committed to:

Providing equality, fairness and respect for all in our employment, whether temporary, part-time or full-time

Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including colour, nationality, and ethnic or national origin)
- religion or belief
- sex
- sexual orientation

Oppose and avoid all forms of unlawful discrimination. This includes:

- pay and benefits
- terms and conditions of employment
- dealing with grievances and discipline
- dismissal
- redundancy
- leave for parents
- requests for flexible working
- selection for employment, promotion, training or other developmental opportunities

PEFC Commitment Statement

Commitment

We hereby declare that our Company is committed to maintaining the PEFC Chain of Custody and will comply with PEFC's Chain of Custody requirements.

This also affirms that the Company, in line with the social, health and safety requirements of the PEFC Chain of Custody standard:

- a) does not prevent workers from freely associating, electing their representatives and bargaining collectively with their employer;
- b) does not apply forced labour;
- c) does not use employees below the legal minimum age;
- d) provides equal treatment to all employees, including in the areas of: recruitment, promotion, work distribution and dismissal;
- e) provides healthy and safe working conditions including documentation and reporting thereon.

In addition to the above, the Company states that the materials will not be marketed or placed on the market:

- a) When it has knowledge that material is from illegal sources,
or
- b) it has received substantial concerns about the legality of the material; unless investigation shows that the previously mentioned concerns can be overcome.

Employment & Labour Policy

Company Commitment:

The Company endeavours to treat all stakeholders (employees, suppliers and customers) with respect and due consideration. The Company commits that it will abide by all applicable UK Government Legislation governing all working practices.

Child Labour

The Company confirms it does not contravene the UK Children and Young Persons Act 2008 & UK Child Employment for under age workers. Company policy is not to employ staff under the age of 18 years old. Full employee records are maintained including the birth date of the employee as evidence.

Forced or Compulsory Labour

The Company does not contravene the UK Modern Slavery Act 2015. Staff have agreed employee contracts in line with Government guidelines. Full employee records are maintained. The written or verbal contract includes, employment conditions (such as working hours and holiday entitlement), rights, responsibilities, duties and that employees are paid at least the National Minimum Wage. Within the UK implied terms of contracts cover; employees not stealing from their employer; the employer providing a safe and secure working environment a legal requirement such as the right to a minimum of number of weeks of paid holidays. The Company shall further conduct all business in an honest and ethical manner in line with the Bribery Act 2010.

Discrimination in Employment

The Company upholds and is legally bound by UK legislation such as the Employment Rights Act 1996 which covers employment contracts, unfair dismissal, family-friendly leave, and redundancy National Minimum Wage Act 1998 is for employees and workers across the UK.

UK employees have a right to: Not be harassed or discriminated against (treated less favourably) because of race, colour, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, disability, age (40 or older) or genetic information (including family medical history).

Freedom of Association or Collective Bargaining

The Company upholds and respects the freedom of association and the effective right to collective bargaining. Where trade unions do not operate at site workers may freely consult a trade union if needed.

Employment & Labour Policy - Company Process & Evidence

Child Labour

The organisation does not use child labour.

The organisation does not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified.

No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.

Responsibility: [Directors](#)

Requirements: Adherence to all applicable UK Legislation

Children and Young Persons Act 2008 & UK Child Employment

Process:

The Company is responsible for maintaining compliant documents and evidence. The Company will ensure that employee records are available including date of birth and verified via official copy documents such as driving licence, passport, right to work permits. All employees are required to provide information regarding their date of birth. This information will be formally recorded on employment records and original documents returned to the employee. The Company may elect to outsource Human Resources responsibilities to a credible third party organisation.

Company Evidence:

Pre-employment checks by the Company to verify age include; date of birth verified via an original driving licence, passport, national id cards, right to work permits; DBS checks or required verification checks or official document to verify age. The Company must return these documents to holder and shall only retain copies. Other documentary evidence as might be stipulated in other company policies.

Forced Labour

The organisation commits to eliminate all forms of forced and compulsory labour.

Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.

There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following: physical and sexual violence, bonded labour, withholding of wages including payment of employment fees and or payment of deposit to commence employment restriction of mobility movement, threats of denunciation to the authorities, retention of passport and identity documents

Responsibility: [Directors](#)

Requirements: Adherence to all applicable UK Legislation

The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to combat modern slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales.

Process:

The Company will maintain appropriate documents. The Company will ensure that employee records are retained including written or verbal contracts; employment conditions; rights; responsibilities and that they are paid at least the National Minimum Wage. The Company may elect to outsource Human Resources responsibilities to a credible third party organisation.

Company Evidence:

Employee contracts issued will state working contracted working hours, place of work, notice period, wage slips, employee letters/ agreements etc. Employees shall be free to leave outside of working hours. Other documentary evidence as might be stipulated in other supporting Company policies or best practice.

Discrimination in Employment and Occupation

The organisation will ensure that there is no discrimination in employment and occupation. Employment and occupation practices are non- discriminatory.

Responsibility: **Directors**

Requirements: Adherence to all applicable UK Legislation

As an integral part of UK labour law it is unlawful to discriminate against a person because of (individual characteristics), which are, age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, pregnancy and maternity, and sexual orientation. Employment Rights Act 1996.

Process

The Company is able to demonstrate equal employment that covers recruitment, selection, promotion, division of work and dismissal through appropriate records and group policies. The Company may elect to outsource Human Resources responsibilities to a credible third party organisation.

Company Evidence

The recruitment and selection policy ensures a non-discriminatory policy. This is demonstrated by job adverts that are non-discriminatory. This process ensures the company does not discriminate when seeking to employ individuals. Copies of dismissal letters, pay records, employment records to show a balanced demographics/ gender positions in job types. This ensures the Company is committed to re-affirming no discrimination applies in the overall employment policy. Other documentary evidence as might be stipulated in other Company policies or best practice.

Freedom of Association and the Right to Collective Bargaining

The organisation will respect freedom of association and the effective right to collective bargaining. Workers are able to establish or join worker organisations that are available of their own choosing.

Responsibility: **Directors**

Requirements: Adherence to all applicable UK Legislation

United Kingdom labour law regulates the relations between workers, employers and trade unions. People at work in the UK benefit from a minimum charter of employment rights, which are found in various Acts, Regulations, common law and equity. This includes the right to a minimum wage for over-25-year-olds under the National Minimum Wage Act 1998. The Working Time Regulations 1998 give the right to 28 days paid holidays, breaks from work, and attempts to limit excessively long working hours. The Employment Rights Act 1996 gives the right to leave for child care, and the right to request flexible working patterns. The Pensions Act 2008 gives the right to be automatically enrolled in a basic occupational pension, whose funds must be protected according to the Pensions Act 1995.

Process

The Company will be able to verify through records if there is any form of discrimination history or current issues. The Company may elect to outsource Human Resources responsibilities to a credible third party organisation.

Company Evidence

Employment contracts, training records, employee committees, employee anonymous suggestions boxes, workers representatives, staff meeting minutes, written policies. Other documentary evidence as might be stipulated in other company policies.

UK Legislation Applicable
Health and Safety at Work Act 1974
Children and Young Persons Act 2008 & UK Child Employment
Children and Social Work Act 2017
Contravening UK Modern Slavery Act 2015
Employment Rights Act 1996 & The Equality Act 2010
Bribery Act 2010
Public Interest Disclosure Act 1998
UK Human Rights Act. 1998 Article 4. Respects freedom of association and the effective right to collective bargaining.

Health & Safety Policy Statement

Policy Statement

Our company is committed to providing a safe, healthy, and comfortable working environment for all employees, contractors, and visitors. We recognise our responsibility to prevent accidents, reduce risks, and promote wellbeing across all office-based activities. Every employee has a role in maintaining a safe workplace and is encouraged to report hazards or concerns promptly.

Our Health and Safety Policy is designed to:

- Prevent accidents and cases of work-related ill health
- Manage any health and safety risks in the workplace
- Provide clear instruction and training to ensure employees are competent
- Provide PPE where required for site visits where required or mandated
- Consult with employees on matters affecting health and safety
- Ensure safe handling of substances ; plant and or equipment (if applicable)
- Maintain safe and healthy working environments
- Implement emergency procedures including evacuation in case of fire or significant incident
- Review this policy regularly

Responsibilities

Person Responsible for overall Health & Safety: **Steve Place - Managing Director**

Day-to-day responsibility for ensuring this policy is put into practice: Steve Place (Director).

To ensure health and safety standards are maintained/improved, safety; training; supervision; risk assessments; consulting employees; monitoring; emergency procedures.

All employees shall co-operate with supervisors and managers on health and safety matters; take reasonable care of their own health and safety; and report all health and safety concerns to an appropriate person (as detailed above).

Arrangements for Health and Safety

Risk Assessment.

Risk assessments will be completed where applicable and reviewed annually. Appropriate action shall be taken where risks have been identified.

Training.

Staff will be given instruction of fire evacuation.

Staff will ensure suitable arrangements are in place to work remotely.

Consultation.

We will consult staff on health and safety matters as they arise.

Review

We will review the policy from time to time to ensure that it is appropriate.