

GDPR & Data Protection Policy Statement

VITRUVIUS

1.0 Commitment

Vitruvius Management Services Ltd ('the Company') respect your privacy and are committed to protecting your personal data. This Policy explains how personal data is collected and used when you engage with our website and how we process any data that you supply. We are committed to these inherent principles in the UK GDPR and particularly to the concepts of privacy and consent. In addition, we aim to ensure:

- That any processing is lawful, fair, transparent and necessary for a specific purpose;
- The personal data we process is adequate, relevant and limited to what is necessary for the purposes for which it was collected;
- That data is accurate and up-to-date;
- Data is not kept longer than is necessary for the purposes for which it was collected; and
- Data is kept safely and securely.

2.0 Data Protection Principles

The **Data Protection Act 1998** was replaced by the **Data Protection Act 2018** and incorporates the **General Data Protection Regulations (GDPR)**.

This Policy sets out the obligations of the Company regarding the framework for data protection law in the UK and the rights of people with whom it works in respect of their personal data under the revised Data Protection Act 2018 ("the Act"), which came into effect on 23rd May 2018 following Royal Assent and introduces distinct data protection regimes into UK Data Protection law. Each regime focuses on the regulation of personal data processing for a specific type or category of data processing.

GDPR is an EU regulation that now, following Brexit, no longer applies to the UK. However, the provisions of GDPR have been incorporated into UK law as the UK GDPR. The regulation applies to any business that processes personal data.

3.0 Policy

The Company is the Data Controller for any personal data that you supply to us and how this is collected and used when you engage with us via our website.

3.1 What Personal Data Do We Collect?

The personal data collected depends on how you use our website. You can browse the site, you can fill in forms on the website to request information or quotes from us, download documents from us, or you can subscribe to our emails, and other activities.

Our website collects personal data to provide these services.



GDPR & Data Protection Policy Statement

VITRUVIUS

3.2 What we do with your Personal Data?

'Personal data' or 'personal information' means any information about an individual from which that person can be identified. When you visit our website, a record of your visit is made allowing obtaining, recording or holding of personal data about you as follows:-

- **Identity Data** includes first name, birth name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

This data is used completely anonymously in order to determine the number of people who visit our website and the most frequently used sections of the site. This enables us to continually update and refine the site.

Our website may also include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Should you use any forms on the website to send an email to us, a record will also be made of your name, company name, postal address, email address and your telephone number and any other information you provide.

Vitruvius will handle your personal data as guided by the GDPR and the Data Protection Act 2018:-

- From data provided on our web forms and questionnaires e.g. to obtain a quote for our services.
- To contact you regarding the services we provide so we can gather more information for the provision of our services, or to deliver those services most effectively.
- To retain your data under our Data Protection Policy for only as long as necessary under the law to protect our legitimate interests.
- To obtain analytical website usage and data (cookies) on the devices used by our website visitors, to improve the website and the services that we offer on our website.



GDPR & Data Protection Policy Statement

VITRUVIUS

- This processing is necessary for the purposes of our legitimate interests.
- Use the personal data that you provide on our web forms and questionnaires as a necessary step to take at the request of the data subject prior to entering into a contract.

3.3 How we use your Personal Data?

Vitruvius processes personal data in order to:-

- Record and update details about those who are associated, affiliated or work with us;
- Undertake surveys, censuses and questionnaires to fulfil its objects and purposes;
- Undertake research, audit and quality improvement work to fulfil its objects and purposes;
- Produce, review and update standards, guidelines and guidance to fulfil its objects and purposes;
- Fulfil its duties as an employer; and
- Monitor its activities including equality and diversity.

3.4 Special Categories

We do not collect any **Special Categories Data**, which is defined as more sensitive and so needs more protection and consists of information as to:-

- Race
- Ethnic origin
- Politics
- Religion
- Trade Union Membership
- Genetics
- Biometrics (where used for id purposes)
- Health
- Sexual orientation

We will only process **special categories of data** when:

- You have given explicit consent to the processing;
- We must process the data in order to carry out our legal obligation, to protect your vital interests or for reasons of substantial public interest; and
- You have already made the data public.

3.5 Who we share your data with

We may share your personal data with third parties who, by law, will respect the security of your personal data and to treat it as such.



GDPR & Data Protection Policy Statement

VITRUVIUS

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Sharing of any personal data will comply with the Data Protection Principles and ensures:-

- There is a good reason for the sharing to take place e.g. to meet a contractual obligation or pursue a research project;
- The individuals have been made aware their data is being shared;
- The minimum amount of personal data is shared, it is only for a minimum time and it is clear what then happens to the data; and
- The sharing is done as securely as appropriate for the data involved and is documented.

3.6 Data Security / Retention

We apply careful consideration to how we store and protect data. Appropriate security measures are in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed and procedures are also in place to deal with any suspected personal data breach. We monitor our systems regularly and carry out updates and maintenance where required, in order to strengthen the security of our storage and processes. **We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. This can be up to six years.**

3.7 Your Rights

You have the following Data Protection Rights:

- Withdraw consent at any time;
- Request access to the data we hold on you, restrict the processing of data and erasure in certain circumstances;
- Request a transfer of the data we hold on you to another party; and
- Object to your information being used for marketing purposes.

3.8 Children

The GDPR provides for special protection for children's personal data and we will comply with the requirement to obtain parental or guardian consent for any data processing activity involving anyone under the age of 16.

3.9 Data Loss

If a data breach occurs that is likely to result in a risk to the rights and freedoms of individuals, the people affected will be informed as soon as possible and the ICO will be notified within 72 hours.



GDPR & Data Protection Policy Statement

VITRUVIUS

3.10 Subject Access Requests

We recognise that individuals have the right to access their personal data and supplementary information and will comply with the one-month timeframe for responses set down in the GDPR.

As a general rule, a copy of the requested information will be provided free of charge although we reserve the right to charge a “reasonable fee” when a request is manifestly unfounded or excessive, particularly if it is repetitive. If this proves necessary, the data subject will be informed of their right to contest our decision with the supervisory authority (the Information Commissioner’s Office (ICO)).

As set out in the GDPR, any fee will be notified in advance and will be based on the administrative cost of providing the information. If you would like to access the information we hold about you, please contact us at:

✉ mail@vitruviusms.co.uk

or write to us at:

Unit 1210 Lansdowne Court, Gloucester Business Park, Gloucester, Glos., GL3 4AB

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.

This policy has been established, agreed and endorsed by the Directors of Vitruvius Management Services Limited.

