

GDPR & Data Protection Policy Statement

1.0 Commitment

Vitruvius Management Services Ltd ('the Company') is committed to being transparent about how it protects, collects and uses personal data of its workforce, subcontractors and clients in order to fully meet its Data Protection obligation. This Policy sets out 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) 2018** and in conjunction with the 'The Data Use and Access Act 2025 (DUAA)'. The DUAA is a new Act of Parliament and amends, but does not replace, the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018 (DPA)** and the **Privacy and Electronic Communications Regulations (PECR)**. The changes will come into effect in June 2026.

This Policy sets out the obligations of Vitruvius Management Services regarding the above Acts for data protection law in the UK and the rights of people with whom it works in respect of their 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 Personal Data

Personal data is defined by the Data protection Act 2018 as 'any information relating to an identified or identifiable living individual, including names, ID numbers, location data, and online identifiers. It applies to both digital and manual records (if part of a filing system), covering processing, storage, and destruction'.

Vitruvius Management Services shall ensure that all Personal Data will be:

- Processed fairly and lawfully;
- Obtained only for specified and lawful purposes and shall not be processed in any manner which is incompatible with those purposes;
- Adequate, relevant, and not excessive with respect to the purposes for which it is processed;
- Accurate and, where appropriate, kept up to date;
- Kept for no longer than is necessary for light of the purposes(s) for which it is processed;



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- Processed in accordance with the rights of data subjects under the Data Protection Act 2018;
- Protected against unauthorised or unlawful processing, accidental loss, destruction, or damage through appropriate technical and organisational measures; and
- Kept secure to prevent the transfer to a country or territory outside of the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Vitruvius Management Services shall also ensure that all data subjects have the right to:

- Access a copy of their personal data held by the Company by means of a Subject Access Request.
- Object to any processing of their personal data that is likely to cause (or that is causing) damage or distress.
- Prevent processing for direct marketing purposes.
- Object to decisions being taken by automated means (where such decisions will have a significant effect on the data subject) and to be informed when any such decision is taken (in which case the data subject has the right to require the data controller (by written notice) to reconsider the decision.
- Have inaccurate personal data rectified, blocked, erased, or destroyed, when requested.

3.2 Sharing of Data/Organisational Measures

The Managing Director, as the Company Data Protection Officer, shall ensure that:

- All employees, agents, contractors, or other parties working on behalf of the Company are made fully aware of both their individual responsibilities and the Company's responsibilities under the Act and under this Policy;
- Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to and use of personal data to carry out their assigned duties correctly shall have access to personal data held by the Company;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so and supervised;
- Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- The Performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed.
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the Act and this Policy by contract.

3.3 Access to Personal Data (Subject Access Request - SAR)

The DUAA clarifies the time limits for organisations to respond to 'Subject Access Requests' (SAR). This includes a **"stop the clock"** rule, allowing Vitruvius Management Services to pause the response time if they need more information from the requester. Once they get the information they need, the response time continues. The Company will ensure to make reasonable and proportionate searches when responding to requests. Any Person that Vitruvius Management Services Ltd hold personal data about may make a subject access request at any time.



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SAR's should be made in writing and addressed to the Managing Director and should be clearly identified as such. It must also make clear whether it is the person themselves that is making the request or whether it is a person acting on his or her behalf. In either case, proof of identity must be provided. If the SAR is made on another's behalf, the individual making the request must provide clear evidence of their authorised capacity to act on behalf of the data subject.

Upon receipt of the SAR, Vitruvius Management Services shall have a maximum period of one calendar month, starting with receipt, however, this can be extended by up to two extra months for complex requests.

Note

Under the UK GDPR, the Company, generally cannot charge a fee for responding to a Subject Access Request (SAR). The information must be provided free of charge. However, the Company can charge a **"reasonable fee"** to cover administrative costs in specific, limited circumstances:

- (i) Manifestly unfounded or excessive requests: If the company can demonstrate that the request is clearly unreasonable or disproportionate, they can charge a fee or refuse the request altogether. This often applies to repetitive requests where no new information is available.
- (ii) Further copies: If an individual requests additional copies of their data after already receiving the initial copy, the company can charge a reasonable fee for the administrative costs of providing those extra copies.

Should Vitruvius Management Services decides to charge a fee, we will inform the individual as soon as possible, explaining the reasons and the cost breakdown. We are not obligated to comply with the request until the fee has been received.

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

*For further details on your rights or make a complaint, any individual can consult the **Information Commissioner's Office (ICO)** website (www.ico.org.uk), which is the UK's independent authority for data protection. Vitruvius Management Services would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.*

3.4 Data Security / Retention

Vitruvius Management Services will apply careful consideration to how we store and protect data. Appropriate security measures are in place to prevent 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.

Note: 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.



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3.5 Your Rights

You have the following Data Protection Rights under the Data Protection Act 2018:

- **Right to be Informed:** Employees must be told how their data is used, for what purpose, and how long it is kept.
- **Right of Access (Subject Access Request/Data Subject Access Request):** Employees can request copies of their personal data, including emails, Teams messages, and files.
- **Right to Rectification:** Employees can require Employers to correct inaccurate or incomplete data.
- **Right to Erasure ("Right to be Forgotten"):** Employees can ask for their data to be deleted if it is no longer necessary, consent is withdrawn, or it is being used unlawfully.
- **Right to Restrict Processing:** Employees can limit how their employer uses their data in specific circumstances.
- **Right to Object:** Employees can object to data processing, especially if it is for direct marketing or if it causes distress.
- **Data Portability:** Employees have the right to receive their personal data in a structured, commonly used, machine-readable format to transfer to another controller.
- **Rights Related to Automated Decision-Making:** Employees have safeguards against purely automated decisions (including profiling) that have significant effects on them.

3.6 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.

3.7 Data Loss

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

This policy is in line with our documented and implemented 'Integrated Management System' and has been established, agreed and endorsed by the Directors of Vitruvius Management Services Limited.



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