

VITRUVIUS



Quality Policy

Vitruvius Management Services Limited provides Specialist Project, Commercial and Construction Management Services and operate a Business Management System meeting the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. We are committed to providing services which completely satisfy the expectations of our customers and all other interested parties.

We implement documented procedures for all functions aimed to meet requirements of the Standard and which provide a framework for establishing and reviewing our management system objectives. We are committed to continuously improve the effectiveness of our management system and the services we provide our customers whilst meeting the expectations of interested parties such as our staff, suppliers, subcontractors, clients, end users, along with all other organisations with whom we have contact.

The Managing Director has the authority and responsibility to ensure that documented systems and procedures are prepared, maintained and implemented to ensure compliance with company policy, customers' requirements and the requirements of all other interested parties and our management system. The Managing Director shall also ensure that any amendments to the Standard referred to above continue to be reflected in our management system.

In our quest for excellence and continual improvement, Vitruvius Management Services Ltd ensures that all staff are suitably trained and are provided with the appropriate resources to meet customer and interested party requirements and expectations as well as statutory and regulatory requirements. We ensure effective implementation and maintenance of our management system through the Internal Audit process.

A handwritten signature in black ink, appearing to read 'Mark Price', with a horizontal line underneath it.

Mark Price
Managing Director
2nd January 2020

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Environmental Policy

Vitruvius Management Services Limited provides Specialist Project, Commercial and Construction Management Services and is committed to prevent pollution so far as is reasonably practicable in all business activities associated with the services we provide our customers.

We have identified our significant environmental aspects which provide a framework for establishing and reviewing the Company Environmental Objectives and Targets. We are committed to Continuously Improve our Environmental Efficiency and are committed to ensure complete compliance to applicable Legal requirements as well as other requirements pertinent to our specific Environmental Aspects. In particular we will promote Environmental Best Practice to enable our clients to improve their own environmental performance.

In addition to this we will:-

- Manage and reduce our own environmental aspects and impacts;
- undertake regular reviews of our operations, measure and maintain our existing environmental performance and where possible make improvements;
- undertake environmental risk assessments in order to identify significant environmental aspects and impacts;
- provide technically competent services and professional solutions that help to conserve and protect the environment;
- raise environmental awareness with our staff, suppliers, subcontractors, clients, end users, and all other interested parties along with all other organisations with whom we have contact; and
- consider sustainable criteria, LCA on plant and equipment and encourage the use of sustainable resources, designs and practices over the whole life cycle of the services we provide.

We are serious about the policies we have declared. These have been established and agreed and endorsed by the Directors of Vitruvius Management Services. We have documented and implemented an integrated

Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007.



Mark Price
Managing Director
2nd January 2020

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Operational Health & Safety (OH&S) Policy

Vitruvius Management Services Limited provides Specialist Project, Commercial and Construction Management Services and is committed to prevent injury and ill health so far as is reasonably practicable in all business activities associated with the services we provide our customers and all interested parties.

We implement documented procedures for all functions aimed to meet requirements of OHSAS 18001:2007 and which provide a framework for establishing and reviewing the Company OH&S Objectives and Targets. We are committed to continuously improving our OH&S performance to ensure complete compliance to applicable Legal requirements as well as other requirements pertinent to our business activities. In addition to this, we will:-

- Undertake regular reviews of our system, measure our existing OH&S performance and report to the Directors to instigate continual improvement of our methods and procedures;
- Undertake Risk Assessments in order to identify areas at risk, reduce those risks to make it as safe as reasonably practicable for those people who come in contact with our activities such as our staff, suppliers, subcontractors, clients, end users, and all other interested parties along with all other organisations with whom we have contact;
- Provide safe systems of work throughout our business activities including: -
 - Promote a positive health and safety culture with our staff, suppliers, subcontractors, clients, end users, and those other organisations with whom we have contact; and
 - Provide built-in safety design criteria to all projects we undertake.

We are serious about the policies we have declared. These have been established and agreed and endorsed by the Directors of Vitruvius Management Services Limited. We have documented and implemented an Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and BS OHSAS 18001:2007.



Mark Price
Managing Director
2nd January 2020

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GDPR POLICY (General Data Protection Regulations)

28th January 2020 v2

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CONTENTS

| | | |
|----|--|---|
| 1. | Introduction..... | 2 |
| 2. | Important Information and Who We Are | 2 |
| 3. | Data Collection and Processing..... | 3 |
| 4. | How is your Personal Data Collected?..... | 4 |
| 5. | How we use your Personal Data | 5 |
| 6. | Disclosures of your Personal Data..... | 5 |
| 7. | Data Security..... | 6 |
| 8. | Data Retention..... | 6 |
| 9. | Your Legal Rights | 7 |

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1. Introduction

Vitruvius Management Services Ltd (VMS Ltd) respect your privacy and are committed to protecting your personal data.

This Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2. Important Information and Who We Are

Purpose

This Policy aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide when you sign up to our newsletter OR purchase a product or service.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Policy so that you are fully aware of how and why we are using your data.

Data Controller

A '**Data Controller**' is the body that is responsible for complying with the Data Protection Act within the United Kingdom. For this purpose VMS Ltd under the General Data Protection Regulation (GDPR) is the Data Controller in respect of personal data processing for Vitruvius Management Services Ltd.

Contact Details

Full Name of Legal Entity

Vitruvius Management Services Limited

Email Address

mail@vitruviusms.co.uk

Postal Address

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

Telephone Number

01242-325005

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 our GDPR Policy and your Duty to Inform us of Changes

We keep our GDPR Policy under regular review. 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.

Third-Party Links

Our website may 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

3. Data Collection and Processing

'Personal data' or 'personal information', means any information about an individual from which that person can be identified.

Processing in relation to information or data means the obtaining, recording or holding of personal data about you as follows:-

- **Identity Data** includes first name, maiden 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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law, as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

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VMS Ltd processes personal data in order to:-

- Record and update details about those who are associated, affiliated or work with VMS Ltd
- 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
- Monitor its activities including equality and diversity

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

4. How is your Personal Data Collected?

We use different methods to collect data from and about you including through:-

- **Direct Interactions** - you may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:-
 - Apply for our products or services
 - Subscribe to our service or publications
 - Request marketing to be sent to you
 - Enter a competition, promotion or survey
 - Give us feedback or contact us
- **Automated Technologies or Interactions** - As you interact with our website we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

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- **Third Parties or Publicly Available Sources** - We will receive personal data about you from various third parties and public sources as set out below:-
 - Technical Data from the following parties:-
 - Analytics providers such as Google based outside the EU
 - Advertising networks
 - Search information providers based inside OR outside the EU.
- Identity and Contact Data from publicly available sources, such as Companies House and the Electoral Register, based inside the EU.

5. How we use your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:-

- Where we need to perform the contract we are about to enter in to or have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal obligation

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your Personal Data

The work VMS Ltd carries out involves processing personal data in compliance with the General Data Protection Regulation 2018. If we ask for personal information we will:-

- Make sure you know why we need this information
- Only ask for information that we need
- Ensure only those appropriate have access to it
- Store your information securely
- Inform you if the information will be shared with a third party
- Only keep your information for as long as we need to

6. Disclosures of your Personal Data

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. 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.

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Sharing of any personal data will comply with the Data Protection Principles and ensure

- 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.
- The sharing is for the minimum time and it is clear what then happens to the data.
- The sharing is done as securely as appropriate for the data involved.
- The sharing is documented.

Data sharing falls into three broad categories:-

Category 1: The sharing of personal data with a third party to be used for joint purposes.

Category 2: The passing of personal data to a third party for it to use for its own purposes.

Category 3: Engaging a third party to handle, store or otherwise use certain personal data on behalf of VMS Ltd

On very rare occasions, the sharing of personal data is obligatory under law (usually under category 2 above), but usually it is at VMS discretion whether or not to share personal data.

7. Data Security

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Procedures are also in place to deal with any suspected personal data breach and we will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data Retention

How long will you use my personal data for?

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.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

9. Your Legal Rights

Under certain circumstances, you have rights under Data Protection laws in relation to your personal data. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights).

This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Signed:



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Mark Price, Managing Director

Date:

28th January 2020
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