



Data Protection Policy

1. INTRODUCTION

Veraxus Ltd recognises the importance of protecting personal data and is committed to processing all information responsibly, lawfully, and transparently.

As part of delivering construction, refurbishment, and associated operational services across the United Kingdom, Veraxus Ltd collects and processes certain personal data relating to clients, suppliers, subcontractors, employees, and professional contacts.

This policy explains how personal data is collected, processed, stored, protected, and managed in accordance with applicable UK data protection legislation.

Veraxus Ltd is committed to ensuring that all personal data is handled securely and with appropriate care at all times.



2. PURPOSE OF THIS POLICY

This policy exists to ensure Veraxus Ltd:

- Complies with all applicable UK data protection legislation and demonstrates a structured commitment to lawful data processing across all business activities.
- Protects the rights and freedoms of employees, clients, suppliers, subcontractors, and other individuals whose personal information may be processed.
- Maintains appropriate standards for the secure collection, storage, handling, and disposal of personal data.
- Reduces the risk of accidental loss, unauthorised access, misuse, disclosure, alteration, or destruction of personal information.
- Demonstrates responsible governance and operational accountability consistent with professional contractor standards expected within commercial and public sector environments.

This policy forms part of Veraxus Ltd's wider compliance and operational governance framework.

3. LEGISLATIVE FRAMEWORK

Veraxus Ltd processes personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (where applicable)

These regulations apply to all personal data regardless of format, including:

- Digital records
- Emails
- Paper files
- Printed documents
- Portable electronic storage



4. DATA PROTECTION PRINCIPLES

Veraxus Ltd processes personal data in accordance with the following principles.

4.1 Lawfully, Fairly and Transparently Processed

Personal data will only be collected and processed where there is a legitimate lawful basis for doing so.

4.2 Collected for Specific Purposes

Data will only be collected for clearly defined business, contractual, legal, or operational purposes.

4.3 Adequate and Relevant

Only information necessary for the intended purpose will be collected.

4.4 Accurate and Kept Up to Date

Reasonable steps will be taken to maintain accuracy.

4.5 Retained Only as Necessary

Data will not be stored longer than required.

4.6 Securely Processed

Appropriate technical and organisational safeguards will be applied.

4.7 Accountability

Veraxus Ltd accepts responsibility for compliance.



5. SCOPE OF THIS POLICY

This policy applies to all areas of Veraxus Ltd operations.

Personnel Covered

- Directors

- Employees
- Temporary staff
- Contractors
- Consultants
- Subcontractors

Business Activities Covered

- Site operations
- Office administration
- Procurement
- Client communications
- Contract administration
- Commercial management

All personnel working on behalf of Veraxus Ltd are expected to comply with this policy.

6. TYPES OF DATA PROCESSED

Veraxus Ltd may process the following categories of personal data where required for legitimate business purposes.

Identification Data

Information used to identify individuals, including full names, job titles, company affiliations, and associated professional details necessary for project delivery and business administration.

Contact Data

Business and personal contact details including telephone numbers, email addresses, postal addresses, and communication preferences used for operational coordination.

Employment Data

Information relating to recruitment, employment administration, right-to-work verification, competency records, qualifications, and related personnel documentation.

Commercial Data

Information connected to contractual relationships, project communications, supplier engagement, procurement administration, and commercial correspondence.

Technical Data

Electronic records generated through routine business systems, including email communication records, controlled access logs, and system-generated operational information.

7. DATA COLLECTION

Personal data may be collected through:

- Client enquiries and contractual engagement
- Supplier onboarding

- Process data only where necessary
- Follow secure handling procedures
- Protect confidential information
- Report concerns immediately



9. DATA STORAGE & SECURITY

Veraxus Ltd applies proportionate technical and organisational measures to protect personal data.

These measures include:

- Password-protected systems restricting access to authorised personnel only
- Controlled access to company records based on operational necessity
- Secure physical storage arrangements for paper records
- Device-level security protections for company equipment
- Careful management of confidential information during internal and external sharing
- Awareness of secure working practices across all personnel

Paper records are stored securely when not in active use.

Electronic records are maintained using secure business systems.



10. DATA USE

Personal data is only used where necessary for:

- Contract administration
- Project coordination
- Supplier engagement
- Employment administration
- Legal compliance
- Operational delivery

Personal data will never be used for unrelated purposes.

11. DATA SHARING

Where necessary, Veraxus Ltd may share data with relevant third parties for legitimate operational purposes.

This may include:

- Professional advisers
- Accountancy service providers
- Legal representatives
- Approved suppliers and subcontractors
- Regulatory authorities where legally required

All data sharing is limited to what is necessary and is carried out responsibly.

12. DATA RETENTION

Data is retained only for as long as reasonably required.

Retention periods are determined by:

- Legal obligations
- Contractual requirements
- Operational necessity

Data no longer required will be securely deleted or destroyed.

13. DATA SUBJECT RIGHTS

Individuals whose data is processed by Veraxus Ltd have legal rights.

Access – Individuals may request confirmation of whether their personal data is being processed.

Rectification – Individuals may request correction of inaccurate data.

Erasure – Individuals may request deletion where lawful.

Restriction – Individuals may request limited processing.

Objection – Individuals may object to processing where applicable.

Portability – Individuals may request transfer of their data where applicable.

All requests will be handled within legal timeframes.

14. SUBJECT ACCESS REQUESTS

Requests should be submitted in writing to:

Veraxus Ltd

Requests will normally be responded to within one month.

Identity verification may be required.

15. DATA BREACH MANAGEMENT

Veraxus Ltd treats all suspected data breaches seriously.

Potential breaches may include:

- Unauthorised access to personal information
- Loss or theft of company devices
- Disclosure to unintended recipients
- Data corruption
- Security incidents affecting systems

Where a breach is identified, Veraxus Ltd will:

- Assess the nature of the incident
 - Take immediate containment action
 - Investigate circumstances
 - Determine reporting obligations
 - Implement corrective measures
-

MONITORING DASHBOARD



16. STAFF AWARENESS

Veraxus Ltd promotes practical awareness through:

- Clear communication of expectations
- Operational guidance
- Management oversight
- Reinforcement of secure working practices

The company's approach is proportionate to business size and operational requirements.

17. THIRD-PARTY PROCESSORS

Where third parties process data on behalf of Veraxus Ltd, reasonable checks will be undertaken to ensure appropriate safeguards are in place.

Only necessary information will be shared.

18. MONITORING & CONTINUOUS IMPROVEMENT

Veraxus Ltd recognises data protection as an evolving compliance area.

The company is committed to:

- Reviewing procedures periodically
- Improving controls where appropriate
- Adapting systems as the business grows
- Maintaining alignment with legal obligations

19. COMPLAINTS

Concerns regarding data handling should first be directed to Veraxus Ltd.

Individuals may also contact:

Information Commissioner's Office (ICO)

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: www.ico.org.uk

20. POLICY REVIEW

This policy will be reviewed:

- Annually
 - Following legislative change
 - Following operational change
 - Following any significant data incident
-

21. DECLARATION

This policy is approved by Veraxus Ltd and applies across all company operations.

Director Name: Alex Stefan

Signature: Alex Stefan

Date: 08 May 2026

Approved and signed electronically on behalf of Veraxus Ltd

This document has been electronically approved and signed by the Director of Veraxus Ltd. The typed signature shown on this page is intended to authenticate and approve this document on behalf of the company.