

Verbus International Ltd – Data Privacy Policy

Verbus International Ltd (VIL) is committed to ensuring that your privacy is protected, and this policy sets out how we use and protect any information that you give VIL when making use of our services.

VIL is a UK company and part of the CIMC Group who operate globally. CIMC as the ultimate parent Company is based in China so any data processing undertaken by VIL may or will be shared with CIMC or across the CIMC Group.

Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy policy.

VIL may change this policy from time to time by updating this page. This policy was last updated in June 2021.

Personal Data Collected

VIL is a holding company supporting UK Group entities who provide modular units for use in the construction industry.

The personal data we collect to fulfil these services is limited to the information we need and involves very little personal data or information about you. This data is processed as a data controller.

The personal information which we use will be taken when:

- you enquire to use our services
- you enquire to join us or are appointed as a UK Group member of staff
- you visit our Group website

We may collect the following types of information:

- your name and contact details such as email address and contact telephone or mobile numbers
- your organisation name and your role in the organisation
- details of our services that you have used
- your company payment or financial information
- your IP address and cookie data
- for our staff, contractors and consultants we will collect data as necessary to fulfil our duties as an employer and as needed to comply with UK employment legislation

VIL does not collect any special category data for processing in our own right as a data controller.

Why do we collect this information?

We collect your personal information:

- to provide you with services that we agree under contractual arrangements as a business or someone who works with us
- for our legitimate interests in the relationship we have with you, as someone who has enquired about the services or requested more information from us
- to meet our legal and regulatory obligations

How do we collect this information?

We collect personal information:

- **directly from you** : e.g. when you are interested or enquire about our or the use of our services; or you work for us as a supplier or consultant
- **directly from businesses or business contacts** : e.g. where your details have been provided to us by other business or industry contacts
- **from publicly available sources** : e.g. social media, internet services.

We are committed to keeping your information up to date as far as is reasonably possible. However, if you believe that we have made an error, then please contact us as we have outlined below and we will use reasonable endeavours to correct.

Keeping your information safe and secure.

Your personal data is important and we are committed to ensuring that it is secure and protected from being inappropriately or accidentally accessed, used, shared or destroyed, and against it being lost.

In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect and will only provide access to your data to staff who require access.

Sharing your data with Third parties

Access to your personal information is only allowed when required by the law or is required as part of fulfilling our service obligations. We do not, and will never, sell or share your personal information with other third parties.

We share data across our Group companies but only where necessary to deliver the contracted services with you. This will include processing data with CIMC in China for financial records (payroll, invoicing, payments, and bank accounts) and our website.

For our general data processing activities, we will additionally use the following businesses to help us administer and monitor the services we provide:

- HR Consultants for our admin and legal requirements
- IT support and administration
- for the administration of payments, payroll and financial accounting
- for any legal guidance in the provision of our services

In our normal business activities, we do not need to nor share data outside the UK & EEA.

However, across Group entities we will and may share your data. Where this is necessary, we will do this with data processing agreements in place to ensure your data privacy and security is maintained in line with this policy.

It should also be noted that processing by Group entities maybe undertaken in countries where the data privacy and laws differ with the UK and EEA. For this reason, we will apply the necessary safeguards as defined by UK GDPR or the Data Protection Act 2018 to ensure your data is used in compliance with this Policy and legislation.

How long do we keep personal information?

We will only keep your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In general terms we will retain the data:

- For our clients for the duration of the services we have contracted to complete and thereafter to meet our financial or legal requirements
- For our suppliers and consultants for the duration of your service support or as agreed with us
- For our staff the records are held in line with HMRC requirements for up to 6 years after you leave us

Marketing & Market Research

VIL will only undertake marketing activity where you have given your consent or where there is a genuine business legitimate interest in the information we will provide.

Currently, we do not undertake any form of direct marketing but may make unsolicited approaches and calling to new potential businesses or contacts using information held within our records or using information drawn from networking contact or publicly available sources. These approaches are made in a fully complaint manner as governed by PECR (the Privacy of Electronic Communications Regulation), with the contacts being given the option to opt out from such contact

Any changes to our marketing activities will be up dated in this Policy and we will ensure that the activity we undertake will be compliant with UK and European data protection regulations

How we use Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual.

The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Links to Other Websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

Controlling your personal information (Your Rights)

It is important that the personal information we hold about you is accurate and current. If you believe that any information we are holding on you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

Under certain circumstances, you have rights under UK Data Protection Act 2018 (DPA) and EU General Data Protection Regulation 2016/679 (GDPR) in relation to your personal information. You may have the right to:

- access information held about you. Your right of access can be exercised in accordance with data protection law;
- object to us processing, or ask us to restrict our processing of your personal information for any of the purposes listed in this policy, at any time.
- ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge.
- ask us to erase or delete your personal information (in certain circumstances). We will do our best to respond to such requests, but these are subject to certain limitations such as legal requirements
- Request a transfer of your personal information (in certain circumstances).

If you wish to exercise any of the above rights or to review, verify, correct or question anything detailed in this policy or are unhappy with any aspect of how we use your data please contact us by writing to :

Data Protection Lead
Verbus International Ltd
9 Mansfield Street
London
W1G 9NY

You also 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.

We are a registered Data controller with the Information Commissioner's Office our ICO registration number is: ZB124336