

# Pell Frischmann

## DATA PROTECTION POLICY

The Company's policy on data protection applies to all companies in the Pell Frischmann Group including any subsidiaries.

The Company is a multi-disciplinary engineering consultancy providing expertise in infrastructure and the built environment.

The Policy of the Company is that our services to the client are performed in a manner that satisfies client's, employees and relevant interested parties needs and expectations, compliance obligations and good practice with regards to data protection.

This Policy has been formalised in the Company's Data Protection Management System, which addresses the model specified in BS10012: 2017 – Data Protection and applicable requirements of the EU General Data Protection Regulation 2016.

The Data Protection Management System has the active commitment of the Board and Senior Management Team who ensures the System is continually improved. The ultimate responsibility for the Data Protection Management System is with the Board and the Chief Executive Officer who provides the necessary financial and physical resources.

The Data Protection Management System is communicated and understood at all levels of the Company through formal training and on-the-job support, to achieve our data protection standards. All Company personnel must observe and comply with the Data Protection Management System.

The data objectives of the Company are as follows:

- To process personal data fairly and transparently. Personal data shall only be processed for legal, regulatory or legitimate organisational purposes
- To obtain personal data only for one or more specified and lawful purposes, and the data shall not be further processed in any manner that is incompatible with that purpose
- Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is being processed
- Personal data shall be accurate and where necessary, it shall be kept up to date
- Personal data processed for any purpose shall be kept secure and shall not be kept longer than is necessary for legal or regulatory reasons or for legitimate organisational purposes
- Personal data shall be processed in accordance with the rights of our data subjects, as required by the EU General Data Protection Regulation 2016
- Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of any personal data
- Personal data will not be transferred to a country or territory outside of the European Economic Area unless that country or territory ensure it has an adequate level of protection in place for the rights and freedoms of our data subjects in relation to their personal data

*Tushar Prabhu*

**Tushar Prabhu**  
**Chief Executive Officer**  
**1 May 2018**