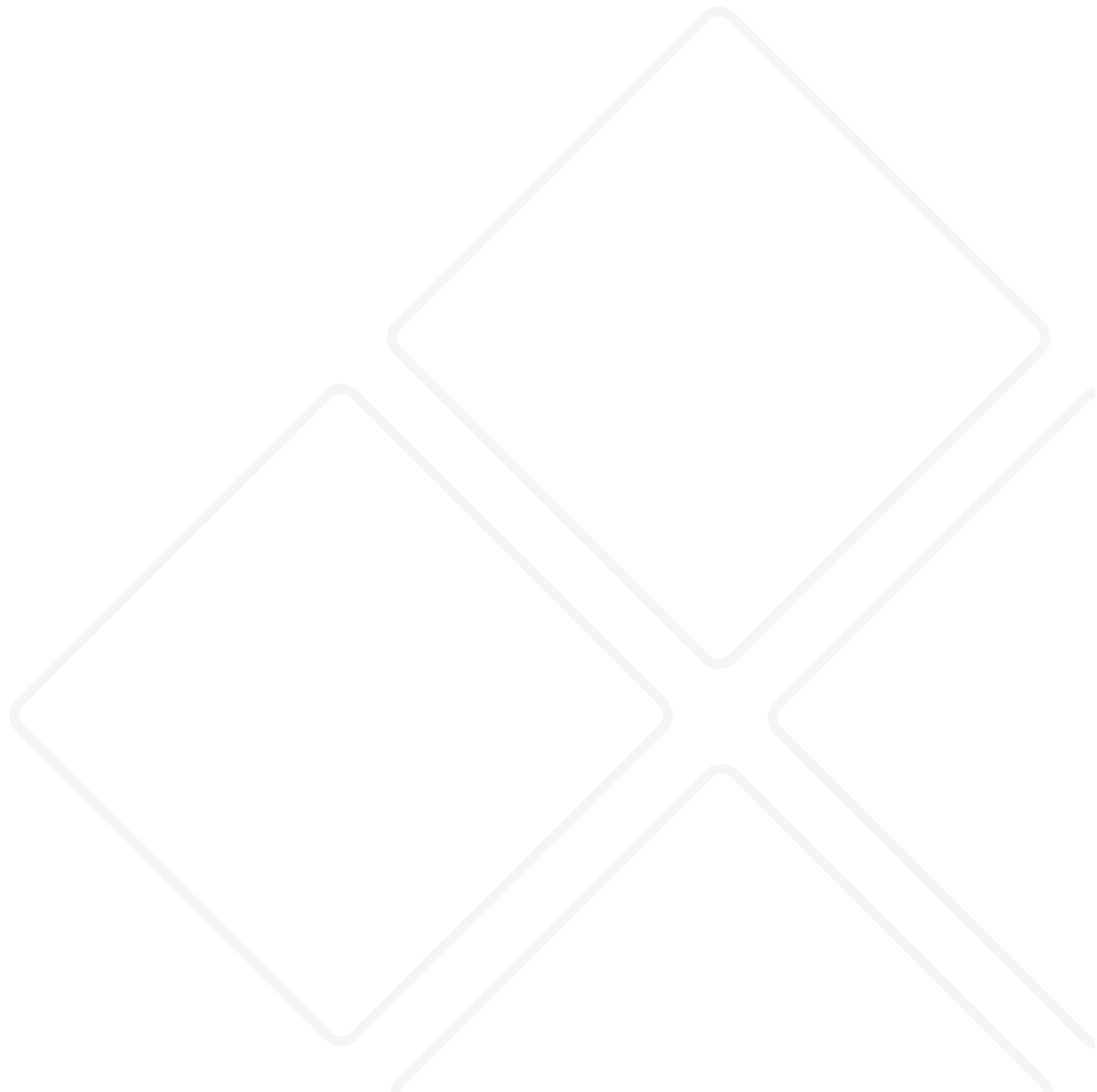




Data Protection Policy

Thursday, 2 May 2024





Data Protection Policy

Vp plc (“the Group”) is committed to ensuring high standards of security and confidentiality for data in our custody and control and that all data is processed fairly and lawfully. Such data includes personal data relating to our employees, customers and suppliers.

Scope

This policy applies to all directors and employees of the Company, including temporary workers and contractors. Appropriate third parties, who manage the Group’s data, have been contacted to ensure they are aware of their requirements outlined in the policy.

Objectives of the policy

- To demonstrate that appropriate steps have been taken to comply with UK GDPR;
- To promote confidence in the Group’s information security (IS) and data handling processes, providing assurance for third parties dealing with the Group;
- To provide a benchmark for employees on IS, confidentiality and data protection issues.

These objectives will be achieved by:

- Designating a Main Board member with responsibility for data handling and privacy issues;
- Implementing appropriate data handling policies and procedures for employees to follow;
- Robust system and data security processes. This area is under constant review to ensure are controls are fit for purpose;
- Regular monitoring of the effectiveness of the implemented policies and procedures.

Promotion

Internally - The responsibilities of all employees has been communicated internally supported by roll out sessions.

Externally - Our compliance with UK GDPR has received careful consideration and the process taken is available via our **Group Compliance Statement** that can be provided to interested parties on request. The compliance statement sets out our review of the requirements, our decision making processes and makes reference to the various policies, procedures and statements from the Group

Supporting documents

The Group has updated and where necessary published the following documents to ensure compliance with UK GDPR:

- Complete data mapping exercise for each area of our business;
- Privacy policies – available via our Group websites;
- Standardised and compliant consent wording where personal data is being shared/collected;



- Documentation used within the business to ensure data requests are fair and reasonable;
- Agreements and documented contact with third parties who manage and process data owned by the Group;
- Formalisation of the Group's data retention and provision policies;
- Legitimate interest assessments to ensure the rights of data subjects are not compromised.
- Data breach response plan.

Review

The Group may from time to time amend this policy statement to reflect changes in circumstance or **applicable legislation**.

This policy is reviewed annually to ensure relevance and its effectiveness.

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| Signature |  _____ |
| Name | <u>Anna Bielby</u> |
| Position | <u>Chief Executive Officer</u> |
| Date | <u>1 December, 2023</u> |