



GLOBAL PRIVACY POLICY & PRIVACY NOTICE

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Applies Globally: Subject to applicable local mandatory law

1. PURPOSE

Engineering Projects TM LTD ("EPTM LTD", "the Company", "we", "us" or "our") respects the privacy of individuals whose personal information we collect, use, store, disclose or otherwise process.

This Global Privacy Policy and Privacy Notice explains how EPTM LTD processes personal information in connection with:

- our company website;
- our mobile applications and progressive web applications;
- enquiries and requests for information;
- architectural, engineering, design and consultancy services;
- construction consultancy and project–management services;
- technical peer reviews and technical assessments;
- quotations, proposals and commercial communications;
- client and prospective–client relationships;
- supplier, consultant and professional relationships;
- recruitment and business administration;
- meetings, communications and correspondence;
- events, marketing and business–development activities;
- contractual and project administration;
- legal, regulatory, security and compliance activities; and
- other legitimate business activities.

This document is intended to provide transparent information about our privacy practices.

EPTM LTD also maintains appropriate internal privacy–management arrangements supporting this Policy, including records of relevant processing activities, privacy–risk assessments, data–subject–rights handling, retention controls, personal–data–breach management and third–party/processor governance, proportionate to the nature and scale of the Company's activities.

2. GLOBAL LEGAL FRAMEWORK

EPTM LTD is a company registered in the United Kingdom and this Policy is principally structured around the UK legal and regulatory framework applicable to the Company's activities.

This includes, as applicable and as amended from time to time:

- the UK General Data Protection Regulation ("UK GDPR");
- the Data Protection Act 2018;



- the Data (Use and Access) Act 2025 and applicable amendments and provisions in force from time to time;
- the Privacy and Electronic Communications Regulations 2003 ("PECR"), as amended;
- applicable UK legislation concerning electronic communications, information security and confidentiality;
- applicable employment and equality legislation;
- applicable consumer and contractual legislation; and
- other applicable UK legal and regulatory requirements.

The Data (Use and Access) Act 2025 amended aspects of the UK's data-protection and privacy framework. All provisions of the Act affecting data-protection law and PECR are subject to their applicable commencement and transitional provisions and, as of 19 June 2026, the ICO confirms that all data-protection provisions of the Act are in force.

Where EPTM LTD operates, provides services or processes personal information in another jurisdiction, EPTM LTD will also comply with mandatory privacy and data-protection requirements applicable to those activities.

3. GLOBAL LEGAL APPLICABILITY

This Policy establishes EPTM LTD's global corporate approach to privacy.

EPTM LTD intends to comply with applicable privacy, data-protection, confidentiality and information-security requirements in each jurisdiction in which it operates or provides services.

Where a mandatory requirement of a particular jurisdiction:

- differs from this Policy;
- imposes additional requirements;
- provides additional rights; or
- conflicts with a provision of this Policy,

the applicable mandatory legal requirement will prevail to the extent of the conflict.

Nothing in this Policy is intended to exclude, restrict, waive or override any legal right, duty, liability or protection that cannot lawfully be excluded, restricted, waived or overridden.

Publication of this Policy does not, by itself, constitute or guarantee compliance with every privacy or data-protection law worldwide. Compliance depends on EPTM LTD's actual activities, processing operations, contractual arrangements, technologies, jurisdictions and the mandatory requirements applicable at the relevant time.

Where local law requires a higher or different standard, EPTM LTD will apply the applicable local requirement.



4. DATA CONTROLLER

Unless otherwise stated in a specific contractual arrangement, EPTM LTD is responsible for determining the purposes and means of processing personal information undertaken for its own corporate and business activities.

Where EPTM LTD processes personal information on behalf of a client as a service provider, processor, contractor or other role determined by applicable law, the applicable contractual and legal arrangements will govern that processing.

EPTM LTD will determine and document its applicable role for material processing activities where necessary, including whether it acts as controller, joint controller or processor.

Where EPTM LTD acts as a processor, it will process personal information only in accordance with the applicable documented instructions and contractual/legal requirements, unless applicable law requires otherwise.

5. INFORMATION WE MAY COLLECT

Depending on the nature of the interaction, EPTM LTD may collect:

5.1 Identity information

Examples include:

- name;
- title;
- professional position;
- company name;
- business identification information.

5.2 Contact information

Examples include:

- email address;
- telephone number;
- business address;
- correspondence details;
- other contact information voluntarily provided.

5.3 Enquiry and service information

This may include:

- information contained in enquiries;
- project requirements;
- service requirements;
- technical information supplied to us;
- information necessary to prepare proposals or quotations;
- correspondence;



- meeting information;
- instructions and project–related communications.

5.4 Contractual and commercial information

This may include:

- agreements;
- purchase orders;
- quotations;
- invoices;
- payment information;
- billing information;
- contractual records;
- supplier information;
- client records.

5.5 Technical information

When individuals interact with our digital services, we may receive information such as:

- IP address;
- device type;
- operating system;
- browser information;
- application information;
- approximate location derived from technical information;
- log information;
- security information;
- usage information.

5.6 Communications information

We may retain business correspondence and communications where reasonably necessary for:

- service delivery;
- customer support;
- contractual administration;
- security;
- dispute resolution;
- legal compliance;
- record keeping.



5.7 Recruitment information

Where individuals apply for employment or engagement, we may process information reasonably necessary for recruitment, selection, onboarding and legal compliance.

EPTM LTD will seek to collect only information that is reasonably relevant and proportionate to the applicable purpose.

6. INFORMATION WE DO NOT GENERALLY SEEK

EPTM LTD does not generally seek sensitive or special–category personal information through its ordinary public–facing website or application or Company's public media.

Individuals should not submit sensitive personal information unless it is genuinely necessary and there is an appropriate lawful basis for doing so.

Where applicable law permits or requires processing of special–category or otherwise sensitive information, EPTM LTD will apply the additional safeguards required by law.

Access to sensitive or special–category information will be limited to persons who reasonably require access for an authorised purpose and will be subject to appropriate security and confidentiality controls.

7. SOURCES OF PERSONAL INFORMATION

Information may be obtained:

- directly from individuals;
- from clients;
- from prospective clients;
- from authorised representatives;
- from suppliers and consultants;
- through forms;
- through communications;
- through the Company's website or application;
- through business platforms;
- through professional or publicly available sources;
- from service providers;
- from publicly available registers;
- from legally authorised third parties.

Where personal information is obtained indirectly, EPTM LTD will provide information required by applicable law concerning the source and processing of that information, subject to lawful exemptions.



8. PURPOSES OF PROCESSING

EPTM LTD shall process personal information for:

- responding to enquiries;
- providing requested services;
- preparing proposals and quotations;
- entering into and performing contracts;
- administering projects;
- communicating with clients;
- managing suppliers and consultants;
- conducting technical and professional activities;
- managing meetings;
- providing customer support;
- maintaining business records;
- managing accounts and invoices;
- maintaining IT systems;
- preventing fraud and misuse;
- protecting systems and information;
- maintaining cybersecurity;
- investigating incidents;
- managing complaints;
- resolving disputes;
- complying with legal obligations;
- establishing, exercising or defending legal claims;
- maintaining professional and corporate records;
- business administration;
- recruitment;
- marketing where legally permitted;
- improving our services;
- analysing usage of our digital services; and
- protecting the rights, property and safety of EPTM LTD and others.

EPTM LTD will not use personal information for materially incompatible purposes without an appropriate lawful basis and, where required, appropriate notice or consent.

Where appropriate, the Company maintains internal records linking material processing activities to their purposes, categories of personal information, categories of individuals, recipients, lawful bases, retention considerations, international transfers and relevant safeguards.



9. LAWFUL BASES FOR PROCESSING

Where UK GDPR or equivalent law applies, EPTM LTD will rely on an appropriate lawful basis.

Depending on the circumstances, this may include:

- performance of a contract;
- taking steps at an individual's request before entering into a contract;
- compliance with a legal obligation;
- legitimate interests;
- consent;
- protection of vital interests where applicable;
- another lawful basis recognised by applicable law.

Where consent is required, EPTM LTD will seek consent in accordance with applicable law.

Consent may generally be withdrawn where legally applicable, although withdrawal does not affect processing that was lawful before withdrawal.

For material processing activities, EPTM LTD will identify and document the applicable lawful basis where required by law or necessary for accountability.

Where special–category information is processed, EPTM LTD will also identify an applicable additional condition where required by law.

10. LEGITIMATE INTERESTS

Where EPTM LTD relies on legitimate interests, we will consider whether:

1. the processing serves a legitimate interest;
2. the processing is necessary for that interest; and
3. the individual's interests, rights and freedoms do not override that interest.

Examples may include:

- business administration;
- cybersecurity;
- fraud prevention;
- service improvement;
- relationship management;
- professional communications;
- protection of Company systems;
- management of legal claims;
- corporate governance.

Where appropriate, EPTM LTD will document legitimate–interest assessments and review them where the relevant processing, risk or circumstances materially change.



11. MARKETING

EPTM LTD may communicate information about its services where legally permitted.

Electronic marketing will be conducted in accordance with applicable privacy and electronic–communications requirements, including PECR where applicable.

Individuals will be provided with appropriate means of controlling marketing communications where required.

Marketing preferences and objections will be respected and appropriately recorded.

Where consent is the applicable lawful basis for electronic marketing, EPTM LTD will maintain appropriate evidence of consent and withdrawal.

12. SHARING PERSONAL INFORMATION

EPTM LTD may share personal information where reasonably necessary and lawful with:

- employees and authorised personnel;
- professional advisers;
- lawyers;
- accountants;
- insurers;
- auditors;
- IT providers;
- hosting providers;
- cloud–service providers;
- software providers;
- communication providers;
- payment providers;
- professional consultants;
- subcontractors;
- regulators;
- public authorities;
- law–enforcement bodies;
- courts; and
- other parties where legally required or authorised.

EPTM LTD does not sell personal information as a general business practice.

Information will be shared only to the extent reasonably necessary for the applicable purpose, subject to applicable law and appropriate confidentiality, contractual and security safeguards.

Where required, EPTM LTD will assess whether a proposed disclosure requires additional legal, contractual or privacy safeguards before the disclosure takes place.



13. SERVICE PROVIDERS AND PROCESSOR GOVERNANCE

Third-party technology providers may process information on EPTM LTD's behalf.

Depending on the systems used, such providers may include:

- cloud hosting providers;
- application platforms;
- website providers;
- email providers;
- document-management platforms;
- analytics providers;
- communications platforms;
- meeting platforms;
- payment providers;
- cybersecurity providers.

EPTM LTD seeks to use appropriate contractual and security measures where required by applicable law.

Where a third-party acts as a processor for EPTM LTD, EPTM LTD will, where required by applicable law:

- conduct proportionate due diligence before appointment;
- assess the provider's competence, security and privacy arrangements having regard to the nature and risk of the processing;
- establish a binding written contract or other legally recognised arrangement containing required processing terms;
- define the subject matter, duration, nature and purpose of processing, relevant personal-information categories and data-subject categories;
- require processing only on documented instructions, subject to applicable legal requirements;
- require appropriate confidentiality obligations;
- require appropriate technical and organisational security measures;
- establish requirements concerning data-sub-processors;
- require appropriate assistance with data-subject rights;
- require appropriate assistance with security, personal-data breaches and privacy-risk assessments;
- establish appropriate requirements for return or deletion of information at the end of the engagement, subject to lawful retention requirements; and
- provide for appropriate audit, assurance or information rights where required and proportionate.

EPTM LTD will maintain an appropriate internal record of material processors and processor arrangements.



Where a processor proposes a material sub–processor or material change to processing, EPTM LTD will apply the applicable contractual and legal authorisation, objection, assessment or notification requirements.

Processor and material third–party arrangements will be reviewed periodically and when significant changes, incidents, risks or regulatory requirements arise.

14. INTERNATIONAL DATA TRANSFERS

EPTM LTD may process or transfer information internationally where necessary for its operations.

Where UK GDPR or other applicable law requires safeguards for international transfers, EPTM LTD will use an appropriate lawful transfer mechanism.

Depending on the circumstances, this may include:

- adequacy regulations or decisions;
- approved contractual safeguards;
- international data–transfer agreements;
- legally recognised transfer mechanisms;
- applicable exemptions where lawful.

EPTM LTD will assess international–transfer arrangements where required and will apply any supplementary safeguards reasonably necessary under applicable law.

15. DATA SECURITY

EPTM LTD applies reasonable and proportionate technical and organisational measures designed to protect personal information against:

- unauthorised access;
- accidental loss;
- destruction;
- alteration;
- disclosure;
- misuse;
- malicious activity.

Security measures may include:

- access controls;
- authentication;
- encryption where appropriate;
- secure cloud services;
- backups;
- monitoring;
- malware protection;



- security updates;
- staff awareness;
- incident–management procedures;
- access limitation;
- secure disposal.

No internet transmission or storage system can be guaranteed to be completely secure.

Security measures will be proportionate to the nature of the information, the purposes of processing, available technology, operational circumstances and the risks to individuals.

Access to personal information will be restricted on a need–to–know or otherwise authorised basis where appropriate.

Where material security weaknesses or incidents affecting personal information are identified, EPTM LTD will take reasonable corrective, containment and remediation measures appropriate to the circumstances.

16. DATA RETENTION

EPTM LTD retains personal information only for as long as reasonably necessary for the relevant purpose, unless a longer period is required or permitted by law.

Retention periods may depend upon:

- contractual requirements;
- legal obligations;
- accounting requirements;
- professional obligations;
- dispute periods;
- limitation periods;
- regulatory requirements;
- security requirements;
- business needs.

EPTM LTD maintains proportionate internal retention arrangements for relevant categories of personal information. These arrangements may specify or take account of the applicable record category, purpose, legal or business requirement, retention period or review point, disposal method and any applicable legal hold.

Where a fixed retention period is not appropriate or cannot reasonably be predetermined, information will be subject to periodic review against the applicable purpose, legal requirements, risks and continuing business need.

Information subject to litigation, investigation, regulatory requirements, legal hold or other preservation obligation will not be deleted until the applicable preservation requirement ends.

When information is no longer required, it will be securely deleted, anonymised or otherwise disposed of where appropriate.



17. DATA SUBJECT RIGHTS

Where applicable law provides such rights, individuals may have rights including:

- access to personal information;
- correction of inaccurate information;
- erasure;
- restriction of processing;
- objection to processing;
- data portability;
- withdrawal of consent;
- rights concerning certain automated decision-making;
- rights concerning direct marketing;
- the right to complain to a supervisory authority.

These rights are subject to applicable legal limitations and exemptions.

17.1 Handling of rights requests

EPTM LTD will maintain a proportionate internal process for handling privacy-rights requests.

Where an individual makes a request:

1. the request will be received through the Company's available privacy or business communication channels;
2. the request will be identified and routed to the person responsible for privacy handling or the appropriate business owner;
3. reasonable steps may be taken to verify the requester's identity where necessary and proportionate;
4. the relevant systems, records, personnel and service providers may be identified and searched where reasonably necessary;
5. the applicable right, lawful limitations, exemptions and response requirements will be assessed;
6. the request and relevant actions will be recorded in an appropriate rights-request log or equivalent record;
7. the response will be provided within the applicable statutory timeframe or any lawful extension;
8. where a request is refused or restricted, the applicable reasons and relevant rights of review or complaint will be explained where legally required; and
9. completion and any required corrective action will be recorded.

Where a request relates to information processed by a processor on behalf of EPTM LTD, the processor will be required, where applicable, to provide reasonable assistance in accordance with the governing contractual and legal requirements.

Nothing in this section guarantees that a request will be granted where an applicable legal exemption, restriction or limitation applies.



18. AUTOMATED DECISION-MAKING

EPTM LTD does not intend to use automated decision-making in a manner that produces legally significant or similarly significant effects on individuals without appropriate consideration of applicable legal requirements.

Where such processing occurs, EPTM LTD will comply with applicable legal requirements concerning transparency, safeguards and individual rights.

Where required, EPTM LTD will assess the purpose, logic, significance, risks and applicable safeguards associated with such processing before implementation or material change.

19. CHILDREN

EPTM LTD's professional services are principally directed towards businesses, organisations and adults.

We do not knowingly seek children's personal information through ordinary business enquiries.

Where applicable law imposes specific requirements concerning children's information, EPTM LTD will comply with those requirements.

Where information concerning a child is unexpectedly received and is not reasonably necessary, EPTM LTD will take appropriate steps to handle or delete it in accordance with applicable law and the circumstances.

20. COOKIES AND SIMILAR TECHNOLOGIES

EPTM LTD may use cookies, local storage, pixels, SDKs and similar technologies.

Their use is governed by the Company's separate Global Cookies Policy.

Where consent is legally required for particular cookies or similar technologies, EPTM LTD will obtain and manage consent in accordance with applicable law.

The Company's cookie-management arrangements may include appropriate information concerning the technologies used, purposes, providers, categories, retention, consent status and available controls.

21. DATA BREACHES

Where EPTM LTD becomes aware of a personal-data breach, we will assess and manage it in accordance with applicable law.

EPTM LTD maintains a proportionate internal personal-data-breach response process covering, as appropriate:

1. identification and initial reporting of suspected incidents;
2. prompt containment and preservation of relevant information;
3. escalation to the appropriate internal responsible personnel;
4. assessment of whether personal information is involved;
5. assessment of the nature, scope, affected individuals, likely consequences and risks;



6. determination of whether notification to a regulator, affected individuals, clients, insurers, law–enforcement bodies or other parties is required or appropriate;
7. preparation and submission of legally required notifications within the applicable statutory timeframe;
8. appropriate remedial and risk–reduction measures;
9. documentation of the incident, assessment, decisions and actions taken; and
10. post–incident review and corrective action where appropriate.

Where notification to a regulator or affected individuals is legally required, EPTM LTD will make such notification within the applicable statutory timeframe.

For UK GDPR matters, where a notifiable personal–data breach is required to be reported to the ICO, EPTM LTD will report it without undue delay and, where feasible, within 72 hours of becoming aware of it, unless another applicable legal requirement provides otherwise.

Where EPTM LTD uses a processor, contractual arrangements will require appropriate prompt notification and cooperation concerning personal–data breaches affecting EPTM LTD's processing.

22. PRIVACY BY DESIGN AND PRIVACY–RISK ASSESSMENT

EPTM LTD seeks to incorporate privacy considerations into the design and operation of its systems and services.

Where legally required, EPTM LTD may undertake data–protection impact assessments or equivalent assessments.

Where a proposed processing activity is likely to result in a high risk to individuals or otherwise requires a formal privacy–risk assessment under applicable law, EPTM LTD will assess the processing before implementation or material change.

A proportionate privacy–risk assessment may consider:

- the nature, scope, context and purposes of processing;
- the categories and volume of personal information;
- the categories of individuals affected;
- the necessity and proportionality of processing;
- potential risks to individuals;
- security and confidentiality risks;
- third–party and processor risks;
- international–transfer risks;
- retention and deletion arrangements;
- safeguards and mitigating measures;
- whether consultation or additional legal review is required; and
- whether the processing should proceed, be modified or be subject to additional controls.



Where a DPIA or equivalent assessment is required, EPTM LTD will document the assessment, relevant decisions and mitigating measures and will review it when material changes occur or where required by law.

23. CONFIDENTIALITY

Personal information may also be protected by contractual, professional and confidentiality obligations.

EPTM LTD will seek to restrict access to information to persons who reasonably require it.

Personnel and relevant third parties may be subject to contractual, professional or other appropriate confidentiality obligations.

Confidentiality obligations will not prevent disclosure where disclosure is legally required or otherwise lawfully authorised.

24. CLIENT-PROVIDED INFORMATION

Where a client supplies personal information to EPTM LTD for the purpose of delivering professional services, the client is responsible for ensuring that it has an appropriate lawful basis and authority to provide that information where required.

EPTM LTD will process such information in accordance with its contractual role and applicable law.

Where EPTM LTD acts as a processor, the applicable client instructions, data-processing terms and applicable law will govern the processing.

EPTM LTD will provide reasonable assistance to the client in relation to applicable data-protection obligations where such assistance is required by law or contract and is proportionate to the processing.

25. PRIVACY COMPLAINTS

Individuals may raise privacy concerns directly with EPTM LTD through the Company's available official communication channels.

EPTM LTD maintains a proportionate privacy-complaints process under which complaints will be:

- received and appropriately recorded;
- acknowledged or otherwise handled as required by applicable law;
- assigned to an appropriate person for review;
- assessed against the relevant facts, processing activities and applicable legal requirements;
- investigated proportionately;
- responded to within the applicable legal or reasonable timeframe; and
- used, where appropriate, to identify corrective or preventive action.

Where required, EPTM LTD will maintain records of privacy complaints and their outcomes.



Individuals may also have the right to complain to the applicable data-protection supervisory authority.

For UK matters, the relevant supervisory authority is the Information Commissioner's Office ("ICO").

26. PRIVACY MANAGEMENT, ACCOUNTABILITY AND RECORDS

EPTM LTD maintains proportionate privacy-management controls designed to support accountability and compliance.

Depending on the nature, scale and risk of its activities, these controls may include:

- records of relevant processing activities;
- records of lawful bases and, where applicable, legitimate-interest assessments;
- retention and disposal arrangements;
- processor and third-party records;
- international-transfer assessments;
- data-subject-rights request records;
- privacy complaints records;
- personal-data-breach records;
- DPIAs and privacy-risk assessments;
- security and access controls;
- confidentiality arrangements;
- privacy training or awareness measures;
- records of material privacy decisions; and
- periodic review of this Policy and relevant privacy controls.

The Company's internal records are not intended to form part of this public Privacy Notice and may contain operational, security, contractual or confidential information that is not publicly disclosed.

EPTM LTD will seek to keep relevant privacy records accurate and up to date and will review them when material processing activities, systems, suppliers, risks, laws or business operations change.

27. POLICY CHANGES

EPTM LTD may update this Policy to reflect:

- changes in law;
- regulatory guidance;
- technology;
- business operations;
- security requirements;
- changes in our services.



The current version published through EPTM LTD's official digital channels will be the applicable version.

Where changes are material, EPTM LTD may provide additional notice or take other steps where required or appropriate.

The "Last Reviewed" date identifies the date on which the Policy was most recently reviewed or materially updated.

28. GLOBAL LEGAL PRINCIPLE

This Policy is a global corporate policy.

It is principally structured around UK law but is intended to operate together with mandatory privacy and data-protection requirements applicable in jurisdictions where EPTM LTD operates or provides services.

Mandatory applicable law prevails where required, in jurisdictions outside of the United Kingdom.

Nothing in this Policy is intended to create rights or obligations contrary to mandatory law.

Where a local privacy notice, contractual data-processing arrangement, client-specific privacy requirement or mandatory local law imposes additional requirements, those requirements will apply to the relevant processing to the extent legally required.
