GDPR: DATA PRIVACY NOTICE FOR CLIENTS, CONSULTANTS AND SUPPLIERS

SPAZIO Ltd is committed to protecting and respecting your privacy.

This policy (together with standard terms and conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

SPAZIO Ltd Privacy Policy

Fair Processing Notice

Our Fair Processing Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR).

1. Introduction

- 1.1 We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information that includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the services we provide to you.
- 1.2 At SPAZIO Ltd we make sure that we apply the best standards to protecting your personal information. if you have any questions about how we use your personal information we can be reached by email at elliot@spazio.com or by post at Spazio Ltd, 27 SCholars Drive, M20 1AY Withington, Manchester (UK)

See section 3 Your Privacy Rights for more information about your rights and how we can help you.

1.3 This Privacy Notice provides up to date information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data). We will update this Privacy Notice if we make any significant changes affecting how we use your personal information, and if so we will contact you to let you know about the change.

2. About us

SPAZIO Ltd is the data controller. This means we decide how your personal data is processed and for what purposes.

Our contact details are:

SPAZIO Ltd, 27 SCholars Drive, M20 1AY Withington, Manchester (UK)

For all data matters and for the purposes of this document the data processor is the Office Manager, Contact Elliot Justin Giovacchini on +44 (0) 7530205914 email elliot@spazio.com

3. Your privacy rights

3.1 You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else. You can make a complaint to us by emailing elliot@spazioltd.com or by writing to to SPAZIO Ltd, 27 SCholars Drive, M20 1AY Withington, Manchester (UK)

4. What kinds of personal information we use

- 4.1 We use a variety of personal information depending on the services we deliver to you. For all services, we need to use your name, address and contact details, to allow us to locate you and visit your land/ property. For some services we might need additional information, for example:
 - bank details for payments, accounting, invoices....
 - Contact details, addresses, and reports on organisations and personnel, for management consulting purposes.
 - Any other information that is relevant to be able to provide the contracted services to you, meet or enforce a legal obligation or where it is fair and reasonable for us to do so.
- 4.2 Sometimes where we ask for your personal information needed to enter into a contract with you or to meet a legal obligation (such as a credit check), we will not be able to provide some services without that personal information.

5. How we gather your personal information

We obtain personal information:

directly from you, for example when you fill out an application, in person, over the telephone or by email

6. How we use your personal information

To provide you with any services we need to know your name, address and contact details. We sometimes need to gather, use and share additional personal information for specific purposes, which are set out in more detail below.

- 6.1 To operate and administer our services, including dealing with your complaints and rectifying problems, we will use:
 - your contact details;
 - We use your information in this way because it is necessary to perform our contract, quotation with you and to meet our legal obligations.
- 6.2 To administer payments from you, we will use:
 - your contact details and the payment details that you have provided to us.
- 6.3 For financial management and debt recovery purposes, we will use:

your contact details;

We will give information to and receive information from third parties where that is necessary to recover debts due by you to us, for example, other banks, debt recovery agents, our accountants, our solicitors, credit reference agencies and sheriff officer or bailiff services. This might include passing personal information about you to a third party who we have transferred your debt to, and who will then contact you directly to collect that debt. If your debt is transferred to a third party you will be advised of the identity of that third party. We use your information in this way because it is necessary to perform our contract with you, to exercise our legal rights, and because it is fair and reasonable for us to do so. 6.4 To carry out market research and analysis to develop and improve our products and services we will use:

- information about how you have used our services, such as which services
 6.5 To market products and services to you from us we will use:
 - 1. the contact details you have provided to us; and
 - 2. information we have gathered from your use of our other products and services to form a profile of you which we will use to assess what other services would be most beneficial for you.
- 6.6 Personal information requirements for Business customers
 For business customers, we will use personal information about key individuals in the
 business, so we can operate and administer the services which we provide to the business –
 to do this we will use:
 - (a) personal information about key individuals who are either a sole trader of the business or are a proprietor, director, company secretary, shareholder, partner, member, committee member, trustee, controller, beneficial owner or authorised signatory to the account of the business.
 - (b) the personal information we use about key individuals is as set out in section 6, and we may use it for any of the purposes described in section 6. We may hold personal information on key individuals for the purposes of operating and administering services which we provide to the business, as well as for the purposes of debt recovery purposes, and to make credit decisions about the business.

Personal information on key individuals is obtained directly from the key individual, from the business to which the key individual is linked with, from the key individual's dealings with any member of Croft Architecture.

7. Our legal basis for using your personal information

7.1 We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

- 1. we have your consent (if consent is needed);
- 2. we need to use the information to comply with our legal obligations;
- 3. we need to use the information to perform a contract with you; and/or
- 4. it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you this can include where it is in our interests to contact you about services, market to you, or collaborate with others on a project or to improve our services.

Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent. See section 10 keeping you up to date, clause 10.2 for details about how to withdraw your consent to marketing.

8. Sharing your personal information with or getting your personal information from others

- 8.1 We will share the necessary elements of your personal information with members of your project team to allow them to be able to provide the contracted services to you, meet or enforce a legal obligation or where it is fair and reasonable for us to do so. See section 6 How we use your personal information for more information about how we do this. We will only share your personal information to the extent needed for those purposes.
- 8.2 Who we share your personal information with depends on the services we provide to you and the purposes we use your personal information for.
- 8.3 The personal information we have about you is information you have given to us, or gathered by us in the course of providing services to you.

9. How long we keep your personal information for

- 9.1 How long we keep your personal information for depends on the products and services we deliver to you. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.
- 9.2 We keep the personal information we use for up to twelve years after the completion of a project. In some circumstances we will hold personal information for longer where necessary for active or potential legal proceedings, to resolve or defend claims, and for the purpose of making remediation payments.

10. Keeping you up to date

- 10.1 We will communicate with you about services we are delivering using any contact details you have given us for example by post, email, text message, social media, and notifications on our website.
- 10.2 Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by calling us directly on +44(0)7530205914, emailing elliot@spazioltd.com or by writing to SPAZIO Ltd, 27 SCholars Drive, M20 1AY Withington, Manchester (UK)

11. Your online activities

11.1 We use cookies to track your use of our website http://www.spazioltd.com/. We may use cookies to provide tailored marketing messages when you are on our website, if you have given us consent.

11.2 Find out more about cookies

A cookie is a small file which is sent to your browser and stored on your computer's hard disc and helps us understand and track your use of our websites and where we can improve the information and services provided. We use cookies solely to gather information on IP

addresses, to analyse trends, administer the website, track your movements on the website and gather broad demographic information for aggregate use.

For information about blocking the use of cookies, please refer to the instructions/help screen on your internet browser. Please note that you may not be able to use or access certain parts of the website or online services if you block the use of all cookies.

12. Extra informations

12.1 External Links

Although this website only looks to include quality, safe and relevant external links users should always adopt a policy of caution before clicking any external web links mentioned throughout this website.

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and it's owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

12.2 Adverts and Sponsored Links

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, to whom may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertisers website through a referral program which may use cookies and will tracks the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on your computers hard drive. Users should therefore note they click on sponsored external links at their own risk and this website and it's owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

12.3 Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and it's owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. This website nor it's owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

12.4 Shortened Links in Social Media

This website and it's owners through their social media platform accounts may share web links to relevant web pages. By default some social media platforms shorten lengthy url's [web addresses] (this is an example: http://bit.ly/zyVUBo).

Users are advised to take caution and good judgement before clicking any shortened url's published on social media platforms by this website and it's owners. Despite the best efforts to ensure only genuine url's are published many social media platforms are prone to spam and hacking and therefore this website and it's owners cannot be held liable for any damages or implications caused by visiting any shortened links.

12.5 Resources & Further Information

GDPR informations

<u>Facebook</u>

Linkedin

Whatsup

Google services