

WATES GROUP INFORMATION AND DATA SECURITY POLICY



Wates Group is a family-owned Construction, Development, House Building, Property Maintenance, Building Services, Facilities Management and Managed Workspace business. As a leader in our chosen markets, our objective is to deliver excellent products and services to our customers safely, professionally and consistently.

We recognise our ethical, legal and professional duty to ensure the information we hold conforms to the principles of confidentiality, integrity and appropriate availability, whilst understanding it's criticality to the on-going functioning and good governance of Wates.

Our approach to Information and Data Security is one of sensible risk identification and management which is driven by our Guiding Framework



We will hold the confidentiality, integrity and appropriate availability of the Information and Data we use to deliver our products and services in the highest regard, and we will comply with legal requirements.

We are committed to developing, reviewing and maintaining the protection of our Information and Data systems to deliver on-going improvements to our performance in these areas. Processes are in place to manage events that occur through the IT infrastructure to allow for normal operation and the appropriate escalation of issues.

We will work with our customers, suppliers and stakeholders to develop clear understanding of our obligations to maintain appropriate Information and Data Security standards.

We are committed to implementing systems and solutions that are monitored as part of a professional, governed framework. Through regular reviews we aim to deliver a consistent approach to deployment, mitigate risk and support Wates vision of on time, on budget, every time.

We are committed to establishing, implementing and maintaining information management and security techniques that facilitate the appropriate management of our customers, suppliers and key stakeholders information. Where personal data forms part of this information, we are committed to demonstrating and ensuring compliance with the GDPR and the Data Protection Act 2018.

In adhering to this policy, in particular we will:

- Actively manage the protection of all Wates information systems (including but not limited to computers, mobile devices, networking equipment, software and data) to mitigate the risks associated with the theft, loss, damage or abuse of these systems.
- By applying the concepts of privacy by design and by default, provide safe and secure information systems working environment for staff and other authorised users. Working with our partners, information will be protected against loss or corruption through the use of appropriate back-up and recovery processes. Actively maintain processes that facilitate only appropriate access to Wates IT facilities and mitigate risk to Wates and its key stakeholders by targeting the prevention of misuse of these facilities.
- Communicate with appropriate authorised users to facilitate the understanding of compliance with this policy, along with the codes of practice, procedures and guidelines relevant to the delivery of our products and services.
- Define and maintain appropriate Disaster Recovery plans to mitigate the risk of scenarios that may impact our Information and Data Security management systems, detailing effective return to operation procedures.
- Ensure that identified breaches of this policy are properly reported, investigated and where necessary concluded through referral to our disciplinary procedures and in compliance with the GDPR and the Data Protection Act 2018.

This policy applies to existing and new employees, and those working with us or on our behalf. Revisions will be communicated to those affected by the changes.

The successful implementation of this policy requires commitment and involvement from everyone, and therefore, everyone should familiarise themselves with its content, and support its implementation, taking the right actions where necessary.

The Executive Committee has overall responsibility for ensuring this policy is complied with and will review it at least once a year, and at such other times as may be required, to ensure it remains relevant and appropriate to the aims and objectives of our business.

For and on behalf of the Executive Committee

DAVID ALLEN

Chief Executive, October 2021