

# LAST UPDATED: April, 2020

We respect the privacy of every person who visits or registers with RDS Global Ltd or uses RDS Global Ltd products or services. We are further committed to ensuring your data, whilst in RDS Global Ltd possession, will be protected at all times.

## **1.** Purpose of this Policy

This privacy policy ('**Privacy Policy**') explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information. This Privacy Policy also sets out your rights in respect of our processing of your personal information.

This Privacy Policy will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer it and/or provide you with access to it.

This Privacy Policy is intended to assist you in making informed decisions when using our products and our services. Please take a moment to read and understand it.

Please also note that this Privacy Policy only applies to the use of your personal information obtained by us.

## 2. Who are we and what do we do?

The Sites and our Services are operated by RDS Global Limited, ("**RDS Global**", "**we**", "**us**" or "**our**").

RDS Global Limited is an English company with registered company number: 3380944 and whose registered office is at Century House St. James Court, Friar Gate, Derby, Derbyshire, England, DE1 1BT.

RDS Global can either be a data controller responsible for your personal information or a data processor that provides services to a third party you may consume a service from. Where RDS acts as a data processor we will only process data stipulated by the controller and no more.

## 3. How to contact us?

If you have any questions about this Privacy Policy or want to exercise your rights set out in this Privacy Policy, please contact us by:

• email, addressed to support@rds.global; or post, addressed to Data Compliance Officer, RDS Global, Century House St. James Court, Friar Gate, Derby, Derbyshire, England, DE1 1BT.

## 4. What Personal information do we collect and how do we use it?

Our primary goal in collecting personal information from you is to:

- verify your identity;
- fulfil our contractual obligations to you;
- provide you with services;
- help us improve our products and services and provide you with information regarding products and services;
- carry out requests made by you on the website, by telephone, email, post;
- investigate or settle inquiries or disputes;
- analytic information obtained from our website, including cookies.



- comply with any applicable law, court order, other judicial process, or the requirements of a regulator;
- enforce our agreements with you;
- protect the rights, property or safety of us or third parties, including our other customers.
- provide support for the provision of our Services; and
- use as otherwise required or permitted by law.

In particular, we use your personal information for the following purposes:

We collect and maintain personal information that you voluntarily submit to us during your use of the Sites and/or our Services, including registering on our Sites, when logging a request or inquiry with any of departments also interaction through email, attendance of events or meetings at RDS Global premises. We may record interaction with you over telephone. RDS Global may also record images of you should you attend an RDS Global site.

We also use the contact and payment details you have provided to us so that we can fulfil the supply of products and services to you or the business that you represent.

## Who do we share your personal information with for this purpose?

We will share your personal information with the following categories of third parties:

- To deliver products and services
- Process returns
- Service providers and vendors
- Process invoicing and payment
- Affiliates and partners that we may engage with
- Companies or ventures that are owned or controlled by RDS Global
- Analytics companies specific to websites activity
- Advertising and marketing partners
- Events and promotions firms that partner with RDS Global
- Competitions and price draws
- Legal bodies that RDS Global are required to engage with by law

## What is our legal basis?

- It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you or the business you represent.
- It is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best customer service we can to you. This may include:
  - To communicate with your regarding services
  - Provide you with important information and notices that may be of interest including any changes in products and services
  - Changes to terms and conditions
  - Respond to requests, inquiries and complaints
  - Surveys in connections with our services
  - To protect you and our staff including recording of telephone calls and CCTV images.
  - To develop, provide and improve our services
  - To assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties



- To comply with laws, regulators, court orders, or other legal obligations or pursuant to legal process.
- In cases where we are not already authorised to process personal data under any of the legal reasons already stated, RDS Global may ask fot your consent to process personal data these may include:
  - Marketing
  - Research
  - Use of cookies

### 5. How do we obtain your consent?

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail, post or telephone using the contact us section on our web page.

## 6. Our use of cookies and similar technologies

"cookie" is a small text file that a web server stores in browser software. A browser sends cookies to a server when the browser makes a connection to the server (for example, when requesting a web page from the same domain that created the cookie). The purpose of cookies is to remember the browser over time and distinguish one browser instance (or user) from all others. Some cookies and other technologies may serve to recall Personal Data previously indicated by a web user. Most browsers allow you to control cookies, including whether or not to accept them, and how to remove them. Cookies can remember login information, preferences, and shopping cart contents. Other cookies, often placed by our partners or other third parties, are used for analytics, marketing, or advertising.

Cookies, as well as other tracking technologies, such as HTML5 local storage, Local Shared Objects (such as "Flash" cookies), web beacons, and similar mechanisms, may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our Site is accessed.

Cookies used for analytics may use non-Personal Data that is not directly linked to you. We use analytics technologies to improve our Site and Services.

Users are advised that if they wish to deny the use and saving of cookies from the Site on to their computer's hard drive, they should take necessary steps within their web browser's settings to block all cookies from the Site and its external serving vendors. Please note that if you choose to erase or block your cookies, you may not be able to access parts of the site and functionality. For information on how to disable cookies, refer to your browser's documentation.

### 7. Third party links and services

Our Sites contain links to third party websites and services. Please remember that when you use a link to go from our Sites to another website or you request a service from a third party, this Privacy Policy no longer applies.

Your browsing and interaction on any other websites, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies.



We do not monitor, control, or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

This Privacy Policy applies solely to personal information collected by us through our Service and does not apply to these third party websites and third party service providers.

### 8. How long do we keep your personal information for?

We will keep your personal information for the purposes set out in this Privacy Policy and in accordance with the law and relevant regulations. We will never retain your personal information for longer than is necessary.

### 9. Confidentiality and security of your personal information

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures in line with **ISO 27001 Frameworks, IASME Framework and Cyber Essentials Framework** to protect the personal information that we have under our control.

Where your data may leave the EU, RDS global will ensure that your data complies with EU GDPR recognised and approved frameworks for example Privacy Shield Framework in the USA.

### 10. How to access your information and your other rights

You have the following rights in relation to the personal information we hold about you:

### Your right of access

If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

### Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you whom we have shared your personal information with so that you can contact them directly.

### Your right to erasure

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If we have shared your personal information with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing it. It will not stop us from storing your personal information though. We will tell you before we lift any restriction. If we have shared your personal information with



others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### Your right to data portability

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

### Your right to object

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- Processing your personal information for direct marketing purposes.

## Your rights in relation to automated decision-making and profiling

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

### Your right to withdraw consent

If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

## Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a> or by calling their helpline on 0303 123 1113. Before submitting a complaint process with the ICO, please contact us through email on <a href="support@rds.global">support@rds.global</a> to formally log a request to exercise your rights.