

R D B Concepts Limited

Privacy Notice



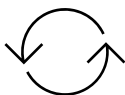
Who should read this privacy notice: Everyone who accesses our website at <https://www.rdb-concepts.com> (**Website**), staff of our clients and prospective clients, or if you are an alternative business contact, such as a supplier or service provider to our business.



What is covered: This privacy notice sets out what information we collect about you, what we use it for and who we share it with. It also explains your rights and what to do if you have any concerns about your personal data.



Who to contact about this privacy notice: If you have any questions about this privacy notice, how we handle your personal data or you are looking to exercise one of your rights, please contact: iso@rdb-concepts.com.



Latest updates: This privacy notice was last updated on 20 April 2022. We may sometimes need to update this privacy notice to reflect changes to the way we provide our services or to comply with updates to data protection law. Where possible, we will notify you of substantial changes, but please check back regularly to see whether any changes have occurred.



Who checks this policy is enforced: The Information Commissioner's Office (ICO) is the UK regulator and is responsible for checking that businesses comply with UK data protection law.

Who we are and other important information

We are R D B Concepts Limited, registered in England and Wales with company number 04211248 and registered address at 71-75 Shelton Street, London, Greater London, United Kingdom, WC2H 9JQ (**RDB, our, we, us**). We are registered with the Information Commissioner's Office (**ICO**), the UK regulator for data protection matters, under number ZB129579.

This privacy notice covers personal data for which RDB is the **controller**.









If you are a website visitor or a contact working for a prospective RDB client, RDB is the **controller** for the information covered (which means we decide what information we collect and how it is used).

Where we have access to or otherwise deal with your information under our client contracts, RDB will normally be the **processor** and our client will be the controller (which means we must follow the

instructions they give us). You should therefore read the privacy notice of the relevant RDB client. However, for certain parts of our services (set out in more detail below), we are the **controller**.

What personal data we collect, and why

Personal data means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we collect, when we collect it, and why we collect it below:

Types of Personal Data		Received from
	Identity Data – your first and last name, your username (if you contact us on social media), and possibly your title.	<ul style="list-style-type: none"> You Our client
	Job Data – your job title, the company you work for and your work address	<ul style="list-style-type: none"> You Our client
	Contact Data – your work email address and work telephone numbers (We may also collect your home address, personal telephone numbers and email addresses if you choose to provide them in relation to support services)	<ul style="list-style-type: none"> You Our client
	Client Data – information on our clients' systems (to the very limited extent we have access to them to provide the services)	<ul style="list-style-type: none"> Our client
	Feedback – information and responses you provide when completing surveys and questionnaires	<ul style="list-style-type: none"> You
	Marketing and Communication Data – includes your preferences in receiving marketing from us (and/or third parties) and your communication preferences	<ul style="list-style-type: none"> You
	Technical Data – internet protocol (IP) address, browser type and version, time zone setting and generic location, browser plug-in types and versions, operating system and platform on the devices you use to access our systems	<ul style="list-style-type: none"> You (directly) You (via cookies and other similar technologies)
	Usage Data – information about how you use our Website	<ul style="list-style-type: none"> You (via cookies and other similar technologies)

We may **anonymise** the personal data we collect (so it can no longer identify you as an individual) and then combine it with other anonymous information so it becomes **aggregated data**. Aggregated data helps us identify trends (e.g. what percentage of website users contact us using our contact form, or average time taken to respond to support requests). Data protection law does not govern the use of this anonymised, aggregated data and the various rights described below do not apply to it.

Our lawful basis for using your personal data

RDB is required to identify a legal justification (also known as a **lawful basis**) for collecting and using your personal data. There are six legal justifications which organisations can rely on. The most relevant of these to us are where we use your personal data to:

- to enter into and perform our **contract** with you
- pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy);
- comply with a **legal obligation** that we have; and
- do something that you have given your **consent** for.

The table below sets out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed in the table, we will update our privacy notice and notify you.

Lawful Basis	Purpose for using your personal data
Legal Obligation	<ul style="list-style-type: none"> • Recording your preferences (e.g. marketing) to ensure that we comply with data protection laws. • Where we send you information to comply with a legal obligation (e.g. where we send you information about your legal rights). • Where we retain information to enable us to bring or defend legal claims.
Legitimate Interests	<p>Where using your information is necessary to pursue our legitimate business interests to:</p> <ul style="list-style-type: none"> • enter into, administer or perform our contract with our client, for example to provide: <ul style="list-style-type: none"> — technical and operational support; — monitoring and management of requests; — monitor and enforce software usage restrictions; and/or — consultancy services; • ensure the proper functioning of our Website; • monitor and make improvements to our Website, including to enhance security and prevent fraud; and • protect our business and defend ourselves against legal claims.

	Where we use your information for our legitimate interests, we have assessed whether such use is necessary and that such use will not infringe on your other rights and freedoms.
Consent	<ul style="list-style-type: none"> • Where you have provided your consent to providing us with information or allowing us to use or share your information. • Where you have consented to receive marketing material from us.

Who we share personal data with

In addition to our staff (which may include self-employed consultants) and those providing technical services to us, we may share your personal data with:

- External third-party providers engaged by us, where necessary (for example, Mailchimp)
- Business partners who either introduce potential clients to us or resell our services to clients, where necessary
- Regulatory authorities, such as HM Revenue & Customs, the UK tax authority
- Our professional advisers, such as our accountants or legal advisors where we require specialist advice to help us conduct our business
- Any actual or potential buyer of our business

If RDB were asked to provide personal data in response to a court order or legal request (e.g. from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response.

Where we store personal data and data transfers

Where we store personal data ourselves, it is stored on our servers within the UK.

Some of our suppliers and partners are based outside of the UK. We will only transfer information outside of the UK where we have a valid legal mechanism in place, to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located, e.g. by using contracts approved by the European Commission or UK Secretary of State.

If you use our services whilst abroad then your personal data may be stored on services located in that country.

Data security

Any data submitted via the internet or through email is not completely secure and we cannot guarantee the security of your data while it is in transit. Any data that you submit is at your own risk.

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- we are ISO27001 accredited and Cyber Essentials certified
- access controls and user authentication (including multi-factor authentication)
- internal IT and network security

- regular testing and review of our security measures
- staff policies and training
- incident and breach reporting processes
- business continuity and disaster recovery processes

Data retention

When we consider how long to keep your personal data, we will consider whether it is still necessary to keep it for the purpose which we collected it or whether the same purpose could be achieved by holding less personal data. We will also consider the volume, nature, and sensitivity of the personal data and the potential harm to you if there was an incident affecting your personal data.

If you browse our website, we keep personal data collected through our analytics tools for only as long as necessary to fulfil the purposes we collected it for (see [Cookies](#) below for further information).

We do not obtain or retain copies of personal data on our clients' systems which we may access in the process of providing support services under our client contracts.

Where we receive personal data in performing our services under contracts with our clients, we store this throughout the period of that contract. We will retain this personal data for 12 months after the end of the contract, following which it will be anonymised. We review the personal data we store in relation to each client on an annual basis, and information relating to individuals who no longer work for the client will be anonymised.

Your rights

You have specific legal rights in relation to your personal data. If you wish to exercise any of these rights, please email iso@rdb-concepts.com

It is usually free for you exercise your rights and we aim to respond within one month (although we may ask you if we can extend this deadline up to a maximum of two months if your request is particularly complex or we receive multiple requests at once).

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. If this happens, we will always inform you in writing. We may charge a fee if we decide to proceed with a request that we believe is unfounded or excessive.

Your legal rights are:

- **Access:** The right to see the information we hold on you.
- **Correction:** The right to request correction of any information held on you that is inaccurate or incomplete.
- **Deletion:** The right to request the deletion of your data and be forgotten from our systems. If you are a company, this will be performed by means of anonymising your contact details whilst still preserving support information for your company.

- **Restriction:** The right to request that we restrict or temporarily limit how we use your personal data (e.g. whilst you check that the personal data we hold for you is correct).
- **Objection:** The right to object to us using your personal data if you want us to stop using it. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.
- **Portability:** The right to ask us to send you or another organisation an electronic copy of your personal data.

Where we send you marketing messages, you have the right to unsubscribe from our contact lists at any time by [clicking the 'unsubscribe' button in the footer of emails we send you, or emailing us at: iso@rdb-concepts.com]

Cookies

Our website uses small text files, called cookies, which are stored on your device when you access and use certain features of the website. Apart from those cookies which are strictly necessary for us to provide you with access to our website or any features that you've requested, we'll only store cookies on your device if you've consented to this when you first access our website and every 90 days thereafter.

We use cookies to:

- to track how visitors use our website
- to record whether you have seen specific messages we display on our website
- where we post content and links to content, we use cookies to capture and analyse information, such as number of views and shares

The cookies we use are:

Cookie	Purpose	What it does	How long it lasts
_loc	Advertisement	This sets this geolocation cookie to help understand the location of users who share the information.	1 year, 1 month
_ga	Analytics	Installed by Google Analytics, _ga cookie calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	2 years

_gid	Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.	1 day
uvc	Analytics	Set by addthis.com to determine the usage of addthis.com service.	1 year, 1 month
at-rand	Analytics	This sets this cookie to track page visits, sources of traffic and share counts.	Never
_atuvc	Functional	This sets this cookie to ensure that the updated count is seen when one shares a page and returns to it, before the share count cache is updated.	1 year, 1 month
_atuvs	Functional	This sets this cookie to ensure that the updated count is seen when one shares a page and returns to it, before the share count cache is updated.	30 minutes
_gat	Performance	This cookie is installed by Google Universal Analytics to restrain request rate and thus limit the collection of data on high traffic sites.	1 minute

We can only use cookies with your permission (you will be prompted by a message when you first visit our website, also known as a cookie banner, where you can choose to accept or decline our cookies).

You can update your cookie settings on our website by using our cookie banner, which you can access using the icon in the bottom left corner of each page.

You can choose to decline cookies but if you turn off necessary cookies, some pages and functions on our website may not work properly. You can also manage cookies through your browser settings or device settings (your user manual should contain additional information).

Links to other sites

We may provide you with links to other, third party websites to help facilitate your access to relevant information.

We are not responsible for the content nor accuracy of other sites. If you access and/or use other sites, you will be subject to the privacy policies of those sites.

Complaints

In the first instance, we would hope to resolve any queries or concerns you have in an informal way, if you contact us at: iso@rdb-concepts.com

If you are not satisfied with our response, you also have a right to complain to the ICO as the regulator of data protection. For further information, please see: <https://ico.org.uk/make-a-complaint/>