

# Privacy Policy

(last updated May 2018)

## Introduction

RApport Global Strategic Services Ltd (“**RApport**” or “**we**” or “**us**”) respects your privacy and is committed to ensuring that your privacy is protected. This Privacy Policy sets out how our business uses and protects any information that you give us (including any data you may provide through our website via [support@rapportss.com](mailto:support@rapportss.com), or correspond or apply for a job with us, or require a service from us). If you provide us with personal information it will only be used in accordance with this privacy policy.

## Important information and who we are

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children.

### Controller

RApport Global Strategic Services Limited, trading as RApport, is the controller and responsible for your personal information (collectively referred to as “RApport” “we”, “us” or “our” in this Privacy Policy).

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below.

### Contact details

Full name of legal entity: RApport Global Strategic Services Limited, trading as RApport

Email address: [support@rapportss.com](mailto:support@rapportss.com)

Registered address: 10 Park Avenue, Camberley, Surrey GU15 2NG.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## What Information We Collect About You & How We Use It

For the purpose of this privacy policy, “Personal Information” means any information relating to an identified or identifiable individual. You may provide us with certain Personal Information when you contact us through email, from interaction at events and through recommendation. This can include your name, email address, town, country, position, job role and any other information you communicate to us.

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- Identity Data includes [first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender].
- Contact Data includes [address, email address and telephone numbers].
- Financial Data includes [bank account and payment card details].
- Marketing and Communications Data includes [your preferences in receiving marketing from us and our third parties and your communication preferences].

We collect information from you to enable us to operate and provide our business and provide our services.

Specifically, where you are a contractor (who works with RApport to support the services we provide to clients) we may collect additional personal information from you outlined below.

- ✓ **Your CV** to assess qualifications and background history of employment;
- ✓ Copies of your identification for booking a business travel related to your role;
- ✓ **Your training record** to ensure the individual has been trained on the relevant tasks and skills to carry out their role within the business;
- ✓ **Your internal supplier assessment questionnaire** to ensure you have the relevant expertise to carry out specific tasks (i.e. technical /scientific background experience);
- ✓ **Your invoices** and payroll related information to ensure we are complying with our legal obligations.

The information we collect from you is used to manage and operate our services as outlined above when:

- ✓ You have consented to the use and
- ✓ We have a legal obligation to use your personal information

## How is your personal information collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your [Identity, Contact and Financial Data] by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  - send us your CV or other information relating to your position as a consultant to us, as detailed above
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - give us some feedback.

## How we use your personal information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to **perform the contract** we are about to enter into or have entered into with you.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a **legal or regulatory obligation**.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to a) working with you as a contractor (but only where the other lawful bases noted above do not apply); and b) in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us using the details above.

## Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact](#) us if you need details about the

specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) fulfilling our contractual obligations to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

## Marketing

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your [Identity, Contact, Technical, Usage and Profile Data] to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal information with any company outside the RApport group of companies for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

## Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Disclosures of your personal information

We do not sell or otherwise disclose any personal information we collect about you, except as otherwise disclosed to you at the time the data is collected.

We may also disclose data about you if we are required to do so by law or legal processing. This may include to respond to a request from a court, law enforcement authorities, or government officials.

We may disclose information when we believe that disclosure is appropriate or necessary to:

- take precautions against liability;
- protect ourselves or others from fraudulent or unlawful activity;
- investigate and defend ourselves against any third-party claims or allegations; or

- to protect our property or other legal rights (including but not limited to, enforcement of our agreements).

We may have to share your personal information with the parties set out below for the purposes set out in the table above.

- External Third Parties set out below:
  - Service providers acting as processors based in the UK, who provide [IT and system administration services].
  - Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK, who provide consultancy, banking, legal, insurance and accounting services.
  - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom [who require reporting of processing activities in certain circumstances].
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.
- We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

## International Transfers

We do not routinely transfer any personal information outside the EEA. [There may be instances where our external third parties are based outside the European Economic Area (EEA) so their processing of your personal information will involve a transfer of data outside the EEA.]

Whenever we transfer your personal information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between the Europe and the US.

## How long we keep your data for

We determine the appropriate retention period for personal information by considering the detail, the nature and sensitivity of the personal information. The information is kept for only as long as is necessary to fulfil the purpose we collected it for and for the purpose of fulfilling our legal obligation.

## How we Protect your Personal Information

We hold all personal information on a cloud based electronic document management system. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed. We limit access to your data to those who have a business need to know.

Where any or suspected personal information breach may occur, we will notify you and the regulator of a breach where we are legally obliged to do so.

## Your rights

We want to ensure that your personal information is accurate and up to date. Please inform us using the details for contact at the start of this Privacy Policy to amend or update any personal details we hold for you.

Under certain circumstances, you have rights under data protection laws in relation to your personal information.

- **Request access to your personal information**

This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction of your personal information**

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure of your personal information**

This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.

- **Object to processing of your personal information**

You may object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing your personal information**

This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected

to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request transfer of your personal information**

We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to withdraw consent**

Where we are relying on consent to process your personal information, you may withdraw that consent. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the contact details above.

#### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you would like to withdraw your consent for us to process your information or request a copy of the information we hold, please contact [support@rapportss.com](mailto:support@rapportss.com).

## **Changes and Updates**

We may update our Privacy Policy from time to time, and you should revisit the website periodically for the most up to date information.