



REDWOOD FM

Privacy Policy

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General Users & Clients

Redwood Security Management Ltd (RSM) takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal and/or sensitive business data. If you need more information, please contact us.

This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal and/or sensitive business data. If you need more information, please contact: privacy@redsec-uk.com.

The controller of your data will be the RSM company or companies stated in your contract and any additional consent you give us. In all other circumstances, the controller of your data will be Redwood Security Management Ltd.

Our personal information handling policy and procedures have been developed in line with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

WHAT INFORMATION DO WE COLLECT?

We collect and process personal business data about you when you interact with us and our products and when you purchase goods and services from us. The personal business data we process includes:

- Your name
- Your home or work address, email address and/or phone number
- Your job title
- Your payment and delivery details, including billing and delivery addresses where you make purchases from us
- Information related to the browser or device you use to access our website, internet browser and operating system

HOW DO WE USE THIS INFORMATION?

We process personal and/or sensitive business data for the following purposes:

- As required to establish and fulfil a contract with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services, holding details for emergency contact (Escalation purposes); this may include, personal mobile, email and addresses. We require this information to enter into a contract with you and are unable to do so without it
- To comply with applicable law and regulation
- In accordance with our legitimate interests in protecting RSM's legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation)
- With your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services
- We may use information you provide to personalise (i) our communications to you; (ii) our website; and (iii) products or services for you, in accordance with our legitimate interests

- To monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests
- Prior to entering into a business arrangement, part of RSM's due diligence checks will be to undertake a business credit check to prevent fraud, in accordance with our legitimate interests and those of third parties
- We may monitor any client account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests
- In circumstances where you contact us by telephone, calls may be recorded for quality, training and security purposes, in accordance with our legitimate interests; and
- We may use your information to invite you to take part in market research or surveys.
- We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication or by emailing the contacts placed in this policy.

WHO AND WHERE DO WE SHARE YOUR INFORMATION?

We may share your personal and/or sensitive business data with our subsidiaries to process it for the purposes of inter-group administration and to deliver products or services where elements of these are provided by group companies other than those with which you have directly contracted. We may also share your personal and/or sensitive business data with the below third parties:

- Our professional advisers such as our auditors and external legal and financial advisers
- Marketing and communications agencies where they have agreed to process your personal data in line with this Privacy Notice
- Market research companies
- Our suppliers, business partners and sub-contractors; and/or
- Search engine and web analytics.

Personal and/or sensitive business data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal and/or sensitive business data may also be shared with third party service providers who will process it on behalf of RSM for the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance, financial, and identity checking. If our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

HOW LONG WILL YOU KEEP MY DATA?

We will not keep your personal and/or sensitive business information for any purpose for longer than is necessary and will only retain the personal and/or business information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a client, we will keep your information for the length of any contractual relationship you have with us and after that for a period of 7 years for HMRC purposes. Where you are a prospective client, we will retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 5 Years from when you last interacted with us or our content.

WHERE WILL MY DATA BE STORED?

The personal and/or sensitive business data that we collect from you will be stored within protected financial or operational systems that are required for the effective delivery of the contractual services. Some data will be stored within business protected equipment such as mobiles phones, laptops or desktop PC's; all of which will hold adequate protection.

WHAT ARE MY RIGHTS?

You have the right to ask us not to process your personal and/or sensitive business data for marketing purposes. You can exercise your right to prevent such processing by contacting us and expressing that wish.

For operational business delivery, we have a legitimate business requirement to hold certain data about you or your company

If the information we hold about you or your company is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal or sensitive data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved [this will be measured against the operational delivery of our services]

In some circumstances you can ask us to erase your personal and/or business sensitive data

- (a) By withdrawing your consent for us to use it
- (b) If it is no longer necessary for us to use your personal and/or sensitive business data
- (c) If you object to the use of your personal and/or sensitive business data and we don't have a good reason to continue to use it; or
- (d) If we haven't handled your personal and/or sensitive business data in accordance with our obligations.

MORE INFORMATION?

Should you have any queries regarding this or our other Privacy Notice, about DMJ's processing of your personal and/or sensitive business data or wish to exercise your rights you can contact RSM's Privacy Team using this email address: privacy@redsec-uk.com.

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk>

APPLICANTS & EMPLOYEES

Redwood Security Management takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about how RSM collects and uses your personal data. If you need more information, please contact: privacy@redsec-uk.com

Unless we inform you otherwise during the recruitment process, RSM will be your data controller and will be the company to which you provide your consent for the processing of your personal data.

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

DATA COLLECTION

We collect and process personal data about you when you apply for a job with us.

The personal data we process includes:

- Your name, home address, email address and/or phone numbers
- Your date of birth, marital status, nationality and National Insurance number (where you provide this to us)
- Your educational and employment history
- Other information contained within your CV or other documents or information you submit to us
- Information from the selection process, if any
- References and assessments relating to your work for previous employers
- Medical and financial information (where you provide this to us)
- Information to confirm your identity and right to work, such as a copy of your passport
- Details of any unspent criminal convictions; and information relating to your feedback on our organisation.
- With your specific consent, information relating to your ethnicity, gender, nationality, disability, religion, sexual orientation and other diversity-related information.

DATA SOURCES

We obtain this information directly from you, our personnel, through our systems and equipment, as well as from third parties such as recruitment agencies, background checking companies or former employers. We may also obtain information from your public profiles available online. The exact source of information will always be provided upon request.

USAGE AND LEGAL BASIS

We process the personal data listed in paragraph 2 above for the following purposes only in accordance with our legitimate interests:

- To enable us to comply with our legal and regulatory obligations
- To make recruitment decisions
- To prevent and detect fraud and other wrongdoing

- To establish, exercise or defend our legal rights; and
- To manage risk

DATA SHARING

We may share your personal data, within our group, for the purposes of intra-group administration. We may also share your personal data with our professional advisors such as our auditors and external legal and financial advisors.

Personal data may be shared with government authorities and/or law enforcement officials if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of RSM for the purposes above. In the event that any part of our business is sold or integrated with another business, your details may be disclosed to our advisors and those of any prospective purchaser and would be passed to the new owners of the business.

DATA RETENTION

We will not keep your personal information for longer than is necessary and will only retain the personal information that is necessary to fulfil the purpose that it was collected for. We are also required to retain certain information by law or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our contractual terms and conditions. We will keep the personal data connected to your job application (including any interview records) for 12 months from the date of their creation by RSM or receipt from you. Successful applicants, who become an employee of the business, will be processed via our Human Resources and Accounts department procedures, and stored in personnel files. Specific retention periods for employee data can be found within the Employee Staff Handbook.

DATA STORAGE

The personal data that we collect from whether digital or not may be stored at one of our business premises and within our software systems. Data may be transferred to and stored outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the other country’s data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place. Further information may be obtained from our HR Department, alternatively you can contact us on: privacy@redsec-uk.com

USER RIGHTS

Where you have consented to us using your personal data, you can withdraw that consent at any time. Having up to date and accurate information is important to us and we will endeavour to keep it up to date and accurate. If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you. Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format. If you have a complaint about how we have handled your personal

data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data

- (a) By withdrawing your consent for us to use it
- (b) If it is no longer necessary for us to use your personal data
- (c) You object to the use of your personal data and we don't have a good reason to continue to use it;
- (d) We haven't handled your personal data in accordance with our obligations.

FURTHER INFORMATION

Should you have any queries regarding this Privacy Notice, about RSM's processing of your personal data or wish to exercise your rights you can contact RSM's HR Department or contact us on privacy@redsec-uk.com

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>

