

## **RPM Communications – Privacy Policy**

This privacy policy sets out the basis on which any personal information we may collect from you, or you provide to us, will be processed, and used by us. It also describes how we use cookies and how you can manage them.

When we refer to "we", "our" or "us" we are referring to RPM Business Communications Ltd, our head office at Customer Support Centre, Suite 3-5, Wensum Mount Business Centre, Low Road, Hellesdon, Norwich, NR6 5AQ (Company No. 8854663) and its subsidiaries or any of them as the context so requires.

Any links from our website to other websites are provided merely for your convenience and do not imply our endorsement of the content or the provider. If you follow a link to any of these websites, you do so at your own risk, and we do not accept any responsibility or liability for the content of such websites.

### **How do we collect personal data from you?**

We receive information about you from you when you use our website, complete forms on our website, if you contact us by phone, email, live-chat or otherwise in respect of any of our products and services or during the purchasing of any such product. Additionally, we also collect information from you when you sign an order form, enter for a promotion or survey, or when you inform us of any other matter.

If you provide us with personal data about a third party (for example when transferring a line or service from another provider), you warrant that you have obtained the express consent from the third party for the disclosure and use of their personal data.

Your personal data may be automatically collected when you use our website services, including but not limited to, your IP address, device-specific information, server logs, device event information, location information and unique application numbers.

### **What type of data do we collect from you?**

In using our website or by registering for any of the products and services we offer through it, you are confirming to us that you understand and accept that your personal information may be used by us in the manner described below.

We may collect and process the following data about you:

- information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our products and services, posting material or requesting further products and services. We may also ask you for information when you report a problem with our website;
- if you contact us, we may keep a record of that correspondence (including email and phone conversations);

- your name, address, telephone numbers, email address and other information which you supply to us;
- payment information if you are purchasing a product or service;
- we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- details of transactions you carry out through our website and the fulfilment of those transactions; and
- details of your visits to our website including, but not limited to, traffic data, location data, weblogs, and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

### **IP addresses**

We may collect information about your computer, including where available your IP address, operating system, and browser type for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

### **Cookies policy**

We use "cookies" in order to personalise your visit to our website and enhance your experience by gaining a better understanding of your particular interests and customising our pages for you. A cookie is a message given to a web browser by a web server and which is then stored by the browser in a text file. Each time the browser requests a page from the server this message is sent back which enables the user's computer to be identified.

We may use the information provided by cookies to analyse trends, administer our website, or for research and marketing purposes to help us better serve you. No information which personally identifies you will be collected through the cookies. If you like, you can set your browser to notify you before you receive a cookie so you have the chance to accept it and you can also set your browser to turn off all cookies.

Please note that some aspects of our website may not be fully functional should you choose for cookies not to be used.

### **How do we use your data?**

We use information held about you in the following ways:

- to process orders that you have submitted to us;
- to provide you with products and services;
- to help us identify you and any accounts you hold with us;
- to provide customer care, including responding to your requests if you contact us with a query;
- to administer accounts, process payments and keep track of billing and payments;

- to detect fraud and to make sure what you have told us is correct;
- to ensure that content from our website is presented in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us or which we feel may be of interest to you, where you have consented to be contacted for such purposes;
- to audit the usage of our website;
- to carry out our obligations arising from any contract entered into between you and us;
- for training purposes, quality assurance or to record details about the products and services you order from us;
- to satisfy and meet our legal and regulatory requirements;
- to allow you to participate in interactive features of our services, when you choose to do so; and
- to notify you about changes to our products and services.

Unless prescribed by law, we will retain your personal information for no longer than is necessary for the purposes for which the personal information was collected or for which it is to be further processed by us.

### **Retention periods**

We will keep your personal data for the duration of the period you are a customer of RPM Communications. We shall retain your data only for as long as necessary in accordance with applicable laws.

On the closure of your account, we may keep your data for up to 7 years after you have cancelled your services with us. We may not be able to delete your data before this time due to our legal and/or accountancy obligations. We assure you that your personal data shall only be used for these purposes stated herein.

### **How do we protect your data?**

Our protection of your data follows an 'information lifecycle', summarised within the following 4 stages:

#### 1. Obtain

- We only use personal data when necessary and lawful (as described in the document above)
- We notify the person when collecting their data in person or via a third party
- We request consent if required

#### 2. Hold

- We only store personal data that must be used ongoing throughout our processes
- We secure the data with encryption and access control, anonymisation or obfuscation
- We keep information up to date

### 3. Use

- We check that there is a lawful purpose or a legitimate reason
- We use in line with consent provided
- We track which data is shared with others

### 4. Delete

- We identify data for retention
- We retain records according to our retention policy (listed within this document)
- We securely delete data that is no longer needed

For more information on data and network security please refer to our separate documentation which can be found on the RPM website at [www.rpmsols.co.uk/information/privacy-policy/](http://www.rpmsols.co.uk/information/privacy-policy/)

### **Disclosure of your information**

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation, or in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **Your rights**

You have a right of access to personal information which we may hold about you (we may charge a small administrative fee for this). To have inaccurate information about you corrected or to request we stop using your personal information for marketing and other purposes. Access requests should be put in writing and addressed to:

RPM Business Communications Ltd, Customer Support Centre, Suite 3-5 Wensum Mount Business Centre, Low Road, Hellesdon, Norwich, NR6 5AQ.

### **Data Processing**

Please refer to our Data Processing Schedule.

### **How to get in touch**

If you have comments or any questions about our Privacy Policy, please contact [compliance@rpmsols.co.uk](mailto:compliance@rpmsols.co.uk).