



RCS GLOBAL
Making Sure.

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RCS Global Data and Privacy Policy

RCS Global LTD recognises the importance of protecting your Personal Information and has implemented this policy in accordance with the relevant laws in the countries in which it operates.

1. Definitions

Act means:

- the Data Protection Act (UK) (UK Act) if you are resident in or dealing with RCS Global LTD in the United Kingdom or the European Union;

RCS Global LTD, we, us, our refers to:

- RCS Global LTD if you are resident in or dealing with us in the United Kingdom or elsewhere in the European Union, respectively; or
- RCS Global LTD and its other subsidiaries and related companies if you are not resident in those territories.

Personal Information has the same meaning as provided in the Act (or 'personal data' in the case of the UK Act).

Sensitive Information has the same meaning as provided in the Act (or 'special categories' in the case of the UK Act).

2. Collection of Personal Information

We will only collect Personal Information where the Personal Information is reasonably necessary for a function or activity of ours.

The types of Personal Information we may collect includes (but is not limited to):

- Name and gender
- Date of Birth
- Postal address
- Telephone or facsimile number
- Email address
- Occupation, references and previous employment history, qualifications and skills
- Relationship or marital status (if previously supplied by you)
- Information provided by you through our website or Twitter accounts
- Your contractual and performance history with us

Personal information will be collected using lawful and fair means and will be collected only from you unless this is unreasonable and impracticable. Personal information may be collected in a variety of ways, including:

- Applications submitted by you or responses to employment advertisements;
- Enquiries made by you through our websites and comments you make through our websites or social media accounts;
- When you follow our social media accounts, and register or subscribe to our mailing list;

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Registered Address: % RIPE, 9a Burroughs Gardens, London, NW4 4AU
Directors: Nicholas Garrett, Harrison Mitchell*

- Through government agencies or third party reporting services;
- You applying to participate in a conference, training session or other event;
- Through direct contact between you and our staff – for example: email, mail, by telephone and direct meeting.

We will take reasonable steps to ensure that the Personal Information we collect is accurate, up to date and complete.

Cookies

Cookies are small text files that are stored on your computer as a result of visiting a website. This allows the site to know that you have visited before and in some cases can be used to record your preferences. Cookies can be used/stored for two reasons:

- To help track usage patterns in order to improve and manage a website; or
- To record preferences in order to personalise your visit to that website.

RCS Global LTD uses cookies on its website. There are options within your browser to not accept or delete cookies should you wish to do so.

3. Storage of Personal Information

We will store your Personal Information in both physical and electronic forms. We will take reasonable steps to ensure that all Personal Information collected from you is stored in a secure environment accessible only by our authorised personnel.

We will endeavour to protect any Personal Information transmitted by you or received from us over the Internet; however, we cannot ensure or warrant the security of this information. These activities are conducted at your own risk. Once we receive your transmission, we will take reasonable steps to ensure its security.

4. Use and disclosure of your Personal Information

The way we use or disclose your Personal Information will depend on the reason(s) why we have received your Personal Information. The basis for the way we will use or disclose your Personal Information will be disclosed at the time of collection or later processing.

Use

We collect your Personal Information for purposes including, but not limited to:

- Provision of services to you, employing you, or receiving services from you;
- Responding to enquiries;
- Assessing your suitability for potential employment or other contractual engagement;
- Submission of documents to our clients including expressions of interest, capability statements and tenders; and
- Compliance with all relevant laws, court/tribunal orders or enforcement related activities.

Disclosure

We may disclose Personal Information that we collect from you for the purpose(s) that it was collected. We may disclose the Personal Information for other purposes where we have received your consent to do so or are required to do so by law.

Examples of where we may disclose your information include, but are not limited to:

- Employees and contractors within our group of companies and external providers to those companies, including service providers and contractors;
- Clients, potential clients, insurers, lawyers, accountants, professionals and others where we have a commercial relationship in place; and
- Government departments and agencies.

We will take reasonable steps to ensure that the Personal Information we use or disclose is accurate, up to date, complete and relevant to the purpose of the use or disclosure.

Retention

We do not keep Personal Information for longer than is reasonably required, which will depend on the nature of the Personal Information we hold and the purposes for which it was received. We maintain a detailed retention schedule for Personal Information but is informed by the following principles:

- In the first instance, Personal Information will be retained as long as required by a relevant law (e.g. to ensure compliance with tax requirements);
- If a relevant law no longer requires us to maintain Personal Information (or that period has elapsed), the Personal Information may then still be retained if required by any relevant contractual agreement or arrangement; and
- For Personal Information to which a relevant law or contractual agreement or arrangement does not apply, we will retain the Personal Information for as long as is required to manage our engagement and/or relationship with you plus a reasonable period afterwards.

Objection or Withdrawal of Consent

If you are a resident or citizen within the European Union or United Kingdom or if you have provided your Personal information to a RCS Global office in the European Union or United Kingdom, where we rely solely on your consent to process your Personal Information, including for the use of marketing materials, you may object to such processing, or withdraw your consent to our ongoing Personal Information processing by notice to us using the details set out in section 10. If you withdraw your consent to our processing of your data, we may no longer be able to receive your services, provide you with services or otherwise contract with you.

Erasure

If you are a resident or citizen within the European Union or United Kingdom or if you have provided your Personal information to a RCS Global office in the European Union or United Kingdom, you may have the right to have your personal Information erased by us in certain limited circumstances, including if we no longer need the Personal Information for the purpose for which it was collected, where we have relied your consent and it is subsequently withdrawn, where we have processed Personal Information unlawfully, or where you request erasure in order to comply with a legal obligation. We may object to such erasure in certain circumstances. You can make such a request using the contact details set out in section 10. If your data is erased, we may no longer be able to receive your services, provide you with services or otherwise contract with you.

Restriction of Processing

If you are a resident or citizen within the European Union or United Kingdom or if you have provided your Personal information to a RCS Global office in the European Union or United Kingdom, you may require that we restrict processing your personal Information where you contest its accuracy (and we are assessing that claim), if we no longer need the Personal Information but you need us to retain it due to a legal claim, or where the processing is unlawful and you do not wish to make an erasure request.

5. Sensitive Information

We may need to collect Sensitive Information such as health information, status, or your membership of a professional association. We will not collect this information without

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providing you with a purpose for collection and obtaining your consent. All sensitive information collected by us will be dealt with strictly in accordance with the requirements of the relevant Act.

6. Unsolicited Personal Information

If we receive unsolicited Personal Information we will make a determination whether the information is reasonably necessary for, or directly related to our functions or activities. If it is, we will ensure that the Personal information is stored in the same manner as if we received the Personal information directly from you. If we find that it is not, we will destroy or de-identify the Personal information. We will comply with any requirement of a relevant law to disclose the collection of such Personal information.

7. Overseas Disclosure of your Personal Information

RCS Global LTD is a global company and we may disclose your Personal Information to our related bodies corporate, suppliers and services providers. Arrangements are in place between each relevant global entity across RCS Global LTD to protect the Personal information to a common standard. This standard includes company-wide compliance to data protection policies, guidelines and SOPs.

We will take steps to limit the flow of your Personal Information across borders, transferring only where protection is in place, where the transfer is required for legitimate use, contract administration (e.g. making payments) or where you otherwise consent. Subject to the above, your Personal Information may be accessible to our entities or offices and employees located in various countries, where such accessibility is required for the performance of the contract or you otherwise consent.

We may allow your Personal Information to be processed by our external IT and data providers and centres located in China, Germany, Spain, United Kingdom, South Africa and the United States of America.

When disclosing your Personal Information, we will take reasonable steps to ensure that the overseas recipients deal with the information in accordance with the Act.

8. Your option not to provide Personal Information

You may not wish to provide us with your Personal Information. Please note that in this circumstance we may be unable to assist you through answering your query, providing you with our services or otherwise contracting with you.

9. Access to and correction of your Personal Information

You may request access to your Personal Information that we hold and we will attempt to provide the Personal Information in the manner you request. We may refuse your request for access to your Personal Information where permitted to do so under the Act, and we will provide you with a written notice that outlines our reasons for refusal. If permitted under the Act, we may charge you reasonable costs in relation to making this Personal information available to you. No charge will be made for requests originating in the European Union or United Kingdom.

You may request us to correct the Personal Information we hold if you believe that the Personal information is inaccurate, out of date, incomplete, irrelevant or misleading. Under certain circumstances permitted by the Act, we may refuse your request to correct your

Personal information and we will provide you with a written notice that outlines our reasons for refusal.

10. Contact and Complaints

If you would like further information on our policy, to contact us on any of the matters set out above, or if you have a complaint about a breach of your privacy you may contact us using the following details:

RCS Global LTD
207 Regent Street
W1H 3HH London
United Kingdom
Email: contact@rcsglobal.com

If making a complaint please provide us with sufficient detail to assist us with any investigation. We will acknowledge receipt of your complaint. We will investigate your complaint and will advise you of the outcome in writing.

If you are unsatisfied with how we have resolved your complaint you may contact:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire SK9 5AF
United Kingdom
Website: <https://ico.org.uk>
Phone: 03031231113

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