

PRIVACY POLICY

NOTICE: The Privacy Policy below will become effective May 25, 2018.

Heads up, what you need to know.

Summary

We will only request and store the minimum amount of personal data we need to:

- Satisfy our regulatory and legal obligations as an employer (of People and other Companies), and our duty of care to you as an employee or sub-contractor.

And we will:

- Hold the data securely and not share it with any person or company outside our jurisdiction without asking your permission first;
- Delete your personal data when it's no longer required under our obligations; and
- when we delete it, we will make sure its permanently deleted and cannot be recovered.

When you are using our services – particularly any websites or mobile applications, we will not:

- Use Geo-location tracking without your permission and consent.

As an employee of this company, or a sub-contractor of this company you are obligated to do the same.

Privacy Policy

Definitions:

“Account” – Means an account required to access and/or use certain areas and features of our Websites and Mobile applications;

“Cookie” – A small text file added to your computer by our site when you visit and open certain pages;

“Cookie law” – means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

“Personal data” - means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us when you join the company or via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and

“We/Us/Our/Company” – means the RG Group Limited, a limited company registered in the UK under company number 2477053, whose registered address is: 4 Abbey Wood Road, Kings Hill, West Malling, Kent ME19 4AB.

When we say “you,” we are referring either to a Customer or to some other person who visits our Website.

“Data Protection Officer (DPO)” – The nominated member of the Company, currently John Kallend - Director (john.kallend@rg-group.co.uk) or via letter at our Registered Address.

What does this Policy Cover?

This Privacy Policy applies to our Services including our Websites and Mobile Applications, as well as our Internal Data Usage and Storage. It's for our employees, our Sub-Contractors and those using any of our services.

Your rights

The Personal Data we hold on any Sub-Contractor is strictly limited.

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

The right to be informed about Our collection and use of personal data;

The right of access to the personal data We hold about you;

The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact via our Data Protection Officer);

The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in our Data Deletion Policy);

The right to restrict (i.e. prevent) the processing of your personal data;

The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

The right to object to Us using your personal data for particular purposes; and

Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact Us via our Data Protection Officer and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

What data do we collect?

We administer and process personal data only as it might be needed for us to deliver to you our Services. The personal data within our control varies between Employees, Contractors to Sub-Contractor, and is limited to:

- Name
- Company you work for
- Email address
- Job Title
- IP Address used to access any of our websites (which may be able to identify the organisation accessing our sites)
- National Insurance Number (if you are a sole trade supplying services)
- Company Address
- Telephone number
- If you have an injury at any of our offices or sites - Static Documents for any Work-Related Injury's that may include details shown below for "Employees Only"
- Employees Only
 - Date of Birth
 - Home address
 - Home telephone number

- Mobile Phone Number (Possibly Personal)
- Employees Contract / Employment Status
- Emergency Contact Details
- Name, Home Telephone and Mobile
- Personal Car Registration
- CSCS Card Number and Expiry Date
- Declared Details of Sickness, Work Related Injury and Absence reasons

This Privacy Policy is intended to describe to you how and what data we administer and process, and how and why we use your data (both general and personal). It also describes options we provide for you to access, update or otherwise take control of the personal data that we process.

If at any time you have questions about our practices or any of your rights described below, you may reach us by contacting the Data Protection Officer.

What information do we process and secure?

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, or a regulatory requirement, or because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

Providing and managing your Account;

Providing and managing your access to Our Site;

Personalising and tailoring your experience on Our Site;

Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);

Replying to emails from you;

Supplying you with emails as required for supplying Our services to you;

In consideration / Negotiation of a potential Contract between us; and

Executing the terms / payments of any Contract between Us

Via our corporate site (www.rg-group.co.uk) only

- We do collect data to promote use of our products and services to you. For example, if we collect your Personal Information when you visit our website and do not sign up for any of the Service, we may send you an email inviting you to sign up or attend an event. If you use any of our Service or website and we think you might benefit from using another part of our Service we offer, we may send you an email about that. You can stop receiving our promotional emails by following the opt-out link included in every email we send.
- In addition, we may use information we collect in order to advertise our products and/or Services to you or suggest additional features of our Services that you might consider using. In addition, we may use your Personal Information to advertise our Services to potential or other users like you.
- We may send you informational and promotional content in accordance with your marketing preferences. You can stop receiving our promotional emails by following the opt-out instructions included in every email.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. See our Data Deletion Policy.

How and where do we store your data?

Your data will be stored in the UK on servers at our Registered Office, or at Company approved Data Centres in the UK in the case of our associated Websites and Mobile applications, in Non-Shared Hosting Environments.

No data personal or otherwise will be removed from our security framework without Company permission, and where permission is granted compliance to this privacy policy will be maintained. Any data used for processing or development will be held on secure servers at Company approved data centres or on the Registered Office Network

We retain data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- mandated by law, contract or similar obligations applicable to our business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights; or
- needed to maintain adequate and accurate business and financial records.

Use of Cookies?

Cookies and similar technologies on our websites and our mobile applications are used for Identification / Authorisation purposes, and these cookies may be used for website usage and analytics. We do use a form of this technology to track your internet usage for marketing or advertising purposes on our main corporate site www.rg-group.co.uk . Cookies allow us to provide important site functionality, so you don't have to re-enter lots of information. They also allow us to remember what links and pages have been clicked or viewed during a session. If you have provided us with personal data, completing a contact form for example, we may associate this personal data with other information. This will allow us to identify and record what is most relevant to you. By using your browser controls, you are always in control of the cookies we store and access on your computer. More information on how to control cookies and limit personal data processing can be found at www.youronlinechoices.com/uk/five-top-tips. For comprehensive information on how to change your cookie settings in a wide variety of different web browsers, visit www.aboutcookies.org.

Users can also control the use of cookies at the individual browser level. We partner with third parties to display advertising on our website or to manage and serve our advertising on other sites. Our third party partners may use cookies or similar tracking technologies in order to provide you advertising or other content based upon your browsing activities and interests. If you wish to opt out of interest-based advertising click <http://www.youronlinechoices.eu/> or if located in the Americas click <http://preferences-mgr.truste.com/>.

Data about Usage of Services is automatically collected when you use and interact with our Services, including metadata, log files, cookie/device IDs and location information. This information includes specific data about your interactions with the features, content and links (including those of third-parties, such as social media plugins) contained within the Services, Internet Protocol (IP) address, browser type and settings, the date and time the Services were used, information about browser

configuration and plugins, language preferences and cookie data, information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and error data, and some of this data collected might be capable of and be used to approximate your location.

Supplemented Data may be acquired by Us, or by us on behalf of our clients, about you from other sources, including publicly available databases or third parties from whom data has been purchased, in which case we may combine this with data we have collected. This combined data will be used as per “How we utilise Information” below.

Beacons/Pixels: On our corporate website and in our marketing emails we use web beacons. When we send emails to Customers, we may track behaviour such as who opened the emails, who clicked the links and which pages of our website they have visited. This allows us to measure the performance of our email campaigns and to improve our Service and website. To do this, we include single pixel, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details. We also include Web Beacons in the emails we deliver for you. We use the data from those Web Beacons to create reports about how your email campaign performed and what actions your Contacts took. Reports are also available to us when we send email to you, so we may collect and review that information.

Cookie / Storage token list

Sites	Name of Cookie	Purpose	Strictly necessary?
Connect, RGHUB	AspNet.ApplicationCookie	Tells us who you are and what pages you are allowed to access. Contains no readable personal data	Yes
Connect, RGHUB	__RequestVerificationToken	Checks the server for authority to access the system	Yes
Connect, RGHUB	LocalStorageVariables (javascript)	Just a few numbers for Company ID and project ID so we know what projects you want to see.	Yes
Rg-group.co.uk	Google Analytics	These cookies provide information about how visitors use our site.	Yes

		These cookies collect information in an anonymous form.	
Rg-group.co.uk	Comunigator – wowanonymousid	The cookie tracks company IP's, website history and additional contact info	Yes
Rg-group.co.uk	GatorLeads	GatorLeads is a tool that identifies the business or organisation that website visitors belong to, based on a reverse IP Lookup. GatorLeads also uses cookies to process this identification, and personal information about individual users is stored. Cookies used by GatorLeads store information about your current web browsing session (pages viewed, time on site etc) and the dates and times of previous website visits	Yes
Rg-group.co.uk	Email Marketing Post-Click Tracking Cookies	These cookies are used to report on the pages that have been viewed by visitors to the site who have followed links from our email marketing campaigns. This analysis helps us to understand additional content that is viewed by the contacts in our database and therefore allows us to improve and tailor future campaigns to those contact's specific areas of interest.	Yes

How we utilize information.

We strongly believe in both minimizing the data we collect and limiting its use and purpose to only that (1) *for which we have been given permission*, (2) *as necessary to deliver the Services our clients have requested*, or (3) *as we might be required or permitted for legal compliance or other lawful purposes*. Any services we provide will reflect these principles. These uses include:

Delivering, improving, updating and enhancing the Services we provide to you. We collect various information relating to use and/or interactions with our Services. We utilize this information to:

- The creation of any Contractual relation we are considering with you;
- The execution of any contract (s) we have with you, including communication during works, payments, and any legal requirements etc;
- Improve and optimize the operation and performance of our Services (again, including our Websites and Mobile Applications);
- Diagnose problems with and identify any security risks, errors, or needed enhancements to the Services;
- Detect and prevent fraud and abuse of our Services and Systems; and
- Collecting aggregate statistics about use of the Services.

Sharing with trusted third parties. We will not share any data we collect or entrusted to us by our Employees and Sub Contractors with any third party unless we first ask those users permission.

Compliance with legal, regulatory and law enforcement requests. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

How you can access, update or delete your data.

The limited amount of person information we collect can be accessed, updated or deleted by contacting the DPO for Contractors and Sub Contractor, or via the DPO and HR Department for Employees

Contact us.

- Data Protection Officer: John Kallend - Director (john.kallend@rq-group.co.uk) or via letter at our Registered Address.

We will respond to all requests, inquiries or concerns within thirty (30) days.