

## Privacy Policy – Royston Limited

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

This policy applies to any individual whose personal information data we process, including customers, suppliers, and professional contacts.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

### Key terms

Please familiarise yourself with the below terms:

<b>We, us, our, Royston</b>	Royston Limited (CRN: 01384241)
<b>Our point of contact</b>	Graham Denholm <a href="mailto:graham.denholm@royston.co.uk">graham.denholm@royston.co.uk</a>
<b>Personal information</b>	Any information relating to an identified or identifiable individual
<b>Special category personal information</b>	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, genetic and biometric data, data concerning health or sexual orientation or trade union membership

### Personal information we collect about you

We may collect and use the following personal information about you:

- your name and contact information, including email address and telephone number and company details
- information to enable us to check and verify your identity
- your billing information, transaction and payment card information
- your contact history and details of services provided to, or received from, you
- information to enable us to undertake credit or other financial checks on you
- information about how you use our website, IT, communication and other systems
- your responses to surveys and promotions
- your personal or professional interests
- your professional online presence, eg LinkedIn profile

This personal information is required to provide products and services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing products and services to you.

Where you are a supplier or professional contact, this personal information is used to order goods and services from you, provide goods and services to third parties, and develop our professional relationship.

## How your personal information is collected

We collect most of this personal information directly from you or your organisation—in person, by telephone, text or email and/or via our website. However, we may also collect information:

- from publicly accessible sources, eg Companies House;
- from a third party, eg credit reference agencies, your bank or building society, other entities or individuals providing services to you, and our professional contacts;
- via our IT systems, eg:
  - automated monitoring of our technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

## How and why we use your personal information

Under data protection law, we can only use your personal information if we have a lawful basis for doing so, eg:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products and services to you and manage our relationship with you	For the performance of our contract with you or to take steps at your request before entering into a contract
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, eg making sure that we can keep in

What we use your personal information for	Our reasons
	touch with our customers about existing orders and new products
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can and develop our business
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer and supplier base, product range or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can and develop our business
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity  To comply with our legal and regulatory obligations
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently
Marketing our services to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, ie to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, ie to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks	For our legitimate interests or a those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards

What we use your personal information for	Our reasons
	To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent.

## Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations outside of our group for marketing purposes.

You have the right to opt out of receiving promotional communications or update your marketing preferences at any time by:

- contacting us at [info@royston.co.uk](mailto:info@royston.co.uk)
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

## Who we share your personal information with

We routinely share personal information with:

- companies within our group;
- professional advisers including lawyers, bankers, auditors, insurers and accountants who provide consultancy, banking, legal, insurance and accounting services;
- third party service providers we use to help deliver our products and services to you, eg payment service providers, IT providers, website hosts;
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers; and
- credit reference agencies.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you.

We may also share personal information with external auditors for regulatory reasons.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

## Where your personal information is held

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: '**Who we share your personal information with**').

## How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing products and services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information. Typically, we will retain your contact information and details of the goods and services provided, including any contracts for a period of 6 years after the contract term expires. If the agreement between us was entered into as a deed, we will retain a copy of the agreement for 12 years.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

## Transferring your personal information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (**EEA**), eg:

- with our offices outside the EEA;
- with your and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

These non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure.

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  —at any time to your personal information being processed for direct marketing;  —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: **‘How to contact us’**;
- let us have enough information to identify you (*eg your full name, address and customer or matter reference number*);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

## Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

## Changes to this privacy policy

This privacy policy was published on 25<sup>th</sup> May 2018.

We may change this privacy policy from time to time. When we do we will inform you via our website or other means of contact such as email.

## Cookies

A cookie is a small piece of data that websites store on your computer. Some cookies only exist whilst you remain on the site and are erased when you close your browser; these are known as session cookies. Others remain on your machine between sessions allowing us to recognise you when you return to the site; these are known as persistent cookies.

### Session Cookies

We use these to improve your user experience. For example, a cookie is stored when a form has been submitted but contains errors. The correct information submitted is stored temporarily so that the user does not have to repeat themselves.

### Persistent Cookies

We use these to remember who you are. For example, we store a cookie allowing us to automatically log you in on your return. We also like to keep track of how many different individuals are visiting our site each day; again this requires a cookie to be stored on each user's machine.

You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies, at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

## How to contact us

Please contact us by post or email if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

<b>Our contact details</b>
Graham Denholm
Royston Ltd
Unit 3, Walker Riverside, Wincomblee Road, Newcastle upon Tyne, Tyne & Wear NE6 3PF
<a href="mailto:graham.denholm@royston.co.uk">graham.denholm@royston.co.uk</a>