

## RGM Vent Ltd

### Website Privacy Notice

This Privacy Notice regulates the use and protection by RGM Vent Ltd and its group affiliates (“RGM Vent Ltd”) of “personal data” you provide to RGM Vent Ltd either when using this Website or otherwise in relation to any processing by RGM Vent Ltd of personal data you provide to RGM Vent Ltd for the purposes set out below unless an alternative separate privacy notice applies to such processing. Personal data is information which identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual.

RGM Vent Ltd is a “controller” under the Data Protection Act 2018 and processes personal data in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (EU 2016/679) (“Data Protection Laws”). For queries on data protection, please contact RGM Vent Ltd’s Data Protection Officer at 30 Church Road, Ballynure, Ballyclare, Co Antrim, BT39 9UF or [info@rgmvent.com](mailto:info@rgmvent.com)

#### Personal Data:

We will not collect any personal data about you or individuals accessing this Website or otherwise communicating or interacting with RGM Vent Ltd, except where: it is specifically and knowingly provided, where it is necessary for RGM Vent Ltd to process or hold for the purposes of the goods or services it provides and where there is a valid legal basis for doing so or an alternative separate privacy notice applies to such processing. Examples of personal data that you may provide to us when accessing this Website or when otherwise communicating or interacting with RGM Vent Ltd, and which we may collect and process, are:

- personal details such as: your name, email address and telephone number
- where controlled by RGM Vent Ltd, CCTV footage or records containing personal images of you when attending our sites or offices unless covered by a separate privacy policy;
- details in relation to you or third parties in connection with insurance claims being pursued by RGM Vent Ltd or its insurers or being brought against RGM Vent Ltd by third party claimants including: name, home address, claim and/or insurance details, vehicle registration details etc.

#### Where we store your personal data:

All personal data you provide to us via the use of this Website is stored on systems with appropriate technical and organisational security measures and controls located within the European Economic Area, which are sufficient to comply with the requirements under the Data Protection Laws. We will only store your personal data for as long as necessary for RGM Vent Ltd to process such personal data for the purposes set out in this Privacy Notice and in accordance with RGM Vent Ltd’s internal retention policies and procedures. In relation to, RGM Vent Ltd controlled CCTV footage, RGM Vent Ltd ensures such footage is only stored for as long as necessary for security purposes and unless otherwise required by law or for establishing, defending or responding to legal claims, periodically deleted no less than every 30 days. The accuracy of the information that we hold about you is important to us. If any of the personal information we hold about you becomes inaccurate or out of date (e.g. a contact/contact information changes), or you object to or wish to restrict us processing it, please inform us as soon as possible using the contact details below, so we can update our records.

### Uses made of the Personal Data:

We use personal data held about you for the following purposes:

- To carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information and services that you request from us;
- To ensure that content from our Website is presented in the most effective manner for users;
- To allow you to participate in interactive features on or via our Website;
- To contact you in order to send you information that you have asked us to provide such as information on RGM Vent Ltd projects or initiatives either by email, telephone or via our 'contact us' page
- To notify you about our services and any changes to those services;
- To store CCTV footage or records containing personal images at our sites or offices for security and safety purposes or for the purposes of potential investigations or legal or regulatory claims;
- Complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes;
- Complying with demands or requests made by any relevant regulators, government departments and law enforcement authorities or in connection with any disputes or litigation;
- In connection with any sale, merger, acquisition, disposal, reorganisation or similar change of entity managing website's business;

Unless otherwise agreed with you, we will not use any of your personal data for automated decision-making or profiling.

### Disclosure of your Information:

We will share your information with the RGM Vent Ltd group of companies and, where relevant, their professional advisers. Where required by law or regulatory requirement, or where necessary to fulfil our contract with you, we may also share your information with:

1. our professional advisers and auditors;
2. regulators, government departments, law enforcement authorities, and insurance companies;
3. any relevant ombudsman, dispute resolution body or the courts; and
4. persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the RGM Vent Ltd business.

Personal data shall not be transferred to or stored at a destination outside the European Economic Area ("EEA").

The transmission of information via email or the internet is not completely secure. We cannot guarantee the security of your data transmitted to our site; and any transmission is at your own risk.

### Legal Basis for Processing:

Data Protection Laws require that we meet certain conditions before we are allowed to use your personal data as described in this Privacy Notice. For personal data which is not 'sensitive personal data' or 'special categories of personal data' under Data Protection Laws, unless otherwise notified, we rely on a condition known as "legitimate interests" in order to process your personal data for the above specified purposes. For example, it is in our legitimate interests to process your personal data in relation to your business contact names, and contact details where it is required by us in order to for us to:

- ensure that content from our Website is presented in the most effective manner for users;

- allow you to participate in interactive features on or via our Website
- administer and respond to inquiries from you in connection with your use of the Website or our products or services;
- procure goods and services for you as a supplier where applicable;
- meet legal obligations under the GDPR and applicable data protection laws to hold necessary information as part of our GDPR compliance programme record-keeping obligations;
- appropriately respond to and/or manage or initiate insurance claims/ proceedings in the interests of RGM Vent Ltd;
- help ensure that our offices and sites have security measures regarding CCTV controls;

We will ensure that the collection and processing of your personal data:

- is kept to a minimum with regards to the amount of data collected and the extent of any processing;
- will not be overly intrusive to you; and
- will be proportionate in order to meet our legitimate interests, as above.

If applicable, we will only process 'sensitive personal data' or 'special categories of personal data' provided by you where you have provided your explicit consent to do so via a separate consent form referencing this privacy notice or where there is an alternative legal basis for such processing under Data Protection Laws.

Your rights in relation to your personal data: Under Data Protection Laws you have the following rights in relation to your personal data:

- right to access your personal data by subject access request;
- right to have your personal data rectified if inaccurate/incomplete;
- right to object to direct marketing;
- in certain circumstances, the right:
  - to have your data erased or removed, and where the personal data has been made public, that other controllers processing the personal data also erase links to, or copy or replication of, such personal data;
  - to restrict the processing of your data;
  - of data portability, namely to obtain and reuse your data for your own purposes across different services;
  - to not be subjected to automated decision making (including profiling) where it produces a legal effect or a similarly significant effect on you; and
  - the right to bring a civil action if there is a breach of the Data Protection Laws.

#### **Contact Us and Complaints:**

You may contact us in relation to the above rights by contacting RGM Vent Ltd's group Data Protection Officer at: [info@rgmvent.com](mailto:info@rgmvent.com) . Requests for subject access to personal data will be administered free of charge unless such requests are manifestly unfounded or excessive in which case we reserve the rights to charge a reasonable fee for administrative costs.

If you are not happy with the way in which your personal data is held or processed by us, or if you are not satisfied with our handling of any request by you in relation to your rights, we would request that you raise a complaint with our Data Protection Officer at the contact details set out above in the first instance, however, you always have the right to complain re: data protection matters to the Information Commissioner Office (ICO). The ICO is the UK's independent body set up to uphold information rights. You can find out more about the [ICO on its website](#).

**Links to Other Website:** This Privacy Notice only applies to this Website and does not apply to any links within the site linking to other websites. We ask you to read the privacy notices on other websites you visit.

Changes to this Privacy Notice: This Privacy Notice is correct as at 2<sup>nd</sup> February 2021, however we keep this Privacy Notice under regular review, and we reserve the right to change it at any time on notice to you.

We will email you to notify you of these changes where:

- we are making substantial changes, or
- where we are doing something with your personal data, which you might not expect based on what we have told you in this Privacy Notice.

Otherwise, any updates to this Privacy Notice will be notified to you by a clearly highlighted banner on the homepage of this Website.