



## RTC PRIVACY POLICY

### FOR SUPPLIERS, CUSTOMERS, PARTNERS AND WEBSITE USERS

[RTC Europe Ltd](#) ("RTC" / "we" / "our" / "us") is committed to protecting and respecting your privacy.

This Policy sets out the basis on which we will process your personal information when you use our services, including the "[RTC Website](#)". Please read it carefully to understand:

- what information we collect about you;
- how we use and share that information; and
- your rights and choices relating to that information.

Our contact details are at the end of this Policy (see [HOW TO CONTACT US](#) below).

#### TOPICS COVERED:

- [WHO WE ARE](#)
- [WHO THIS POLICY APPLIES TO](#)
- [YOUR EMPLOYER](#)
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- [INFORMATION WE COLLECT ABOUT YOU \(INCLUDING WHEN AND HOW WE COLLECT IT\)](#)
- [HOW WE USE YOUR INFORMATION AND OUR LEGAL BASIS FOR DOING SO](#)
- [SHARING / ENABLING OTHERS TO PROCESS YOUR INFORMATION](#)
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- [TRANSFERRING YOUR INFORMATION OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA \("EEA"\)](#)
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## WHO WE ARE

RTC Europe Ltd is a company registered in England and Wales under company number 02108779 whose registered office is at Castle Road, Eurolink, Sittingbourne, Kent, ME10 3RN.

For our contact information, please see [HOW TO CONTACT US](#).

## WHO THIS POLICY APPLIES TO

Unless we say otherwise, the terms of this Policy apply to:

- current and prospective “**Business Contacts**”, i.e. employees and representatives of any of our suppliers, customers and partners; and
- “**Website Users**”, i.e. visitors to the RTC Website, but not job applicants or candidates (see below).

If you give us your information for recruitment purposes; for example, if you use the RTC Website to search and apply for a job, please see our separate recruitment [privacy notice](#).

Some sections of this Policy only apply to Business Contacts and Website Users in the EU and the UK. We make it clear where this is the case.

Where we refer to the “**EU**”, we mean the following countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.

## YOUR EMPLOYER

If you are a **Business Contact**, where we refer to “**your employer**” in this Policy, we mean the organisation you represent (whether you are an employee, consultant or contractor of that organisation).

## OTHER TERMS WHICH APPLY TO YOU

Please read our [COOKIE POLICY](#) to understand the cookies we use in connection with the RTC Website.



## INFORMATION WE COLLECT ABOUT YOU (INCLUDING WHEN AND HOW WE COLLECT IT)

We collect the following personal information from and about you:

- 1. Information you give to us**
- 2. Information your employer gives to us**
- 3. Information we collect about you when you visit the RTC Website**
- 4. Information we collect from third parties**

We collect the following personal information from and about you:

### **1. Information you give to us**

You may give us information about you, including your name, job title, e-mail address, telephone number, work address, information about your employer and any other relevant information about you, if:

- you make an enquiry with us;
- you send us a message via the RTC Website;
- you give us your business card or contact details (e.g. at an exhibition or trade fair);
- you use our services; or
- you contact or correspond with us for any other reason (including via third party social media sites).

If you are a **Business Contact**, you may have given us information about you in the past, for example, if we have had previously traded with you or your employer.

### **2. Information your employer gives to us**

If you are a **Business Contact**, your employer may give us information about you to enable you to deal with us, such as your name, job title, e-mail address, work address, information about your employer and other relevant information about you.

### **3. Information we collect when you visit the RTC Website**

If you are a **Website User** (depending on the access restrictions on your device), we may collect certain information when you visit the RTC Website, including:



- certain technical information, for example, the type of device you are using (including its unique device identifier), the internet protocol (IP) address used to connect your device to the internet, your login information, browser type and version (if applicable), time zone setting, operating system and network information;
- information about your visit to the RTC Website, including the full Uniform Resource Locators (URL), clickstream to, through and from the RTC Website (including time and date), parts of the RTC Website you viewed, response times, length of visits to certain parts of the RTC Website, information about your device interaction with the RTC Website (such as scrolling and clicks); and
- certain cookies or other tracking technologies which are capable of identifying your device (see our **Cookie Policy** to understand what cookies we use).

#### **4. Information we collect from third parties**

If you are a **prospective Business Contact**, we may obtain information about you from third parties, including your name, job title, employer and other information you make available, from social media platforms such as LinkedIn. We do so to get in touch with you via those social media platforms regarding services of ours which may be of interest to you (see [MARKETING](#)).

#### HOW WE USE YOUR INFORMATION AND OUR LEGAL BASIS FOR DOING SO

We collect information about you so that we can provide and promote our services to you and your employer, and so that we can operate the RTC Website effectively.

The information we process depends on how you interact with us. For example it may vary depending on how you communicate with us and how you use the RTC Website.

You may choose not to provide or allow us to collect certain information. If this is the case, we may not be able to provide you with some of our services (where we need that information to do so).

Learn more below about how and why we use your information (and our legal basis for doing so) if you are a:

- [Business Contact](#)
- [Website User](#)



<b>Business Contacts</b>		
<b><i>Type(s) of personal information we process</i></b>	<b><i>Why we process this personal information</i></b>	<b><i>Our legal basis for processing this personal information</i></b>
<ul style="list-style-type: none"> <li>✓ Your first and last name</li> <li>✓ Your job title</li> <li>✓ Your e-mail address</li> <li>✓ Your telephone number</li> <li>✓ Your work address</li> <li>✓ Information about your employer</li> <li>✓ Any other information you choose to give us</li> </ul>	<p>To help us to identify you and your employer</p> <p>To enable us to provide our services to you and your employer</p> <p>To deal with and respond to any enquiries, messages or other correspondence from you</p>	<p>To enable us to pursue our legitimate interests to:</p> <ul style="list-style-type: none"> <li>• provide our services to you and your employer; and</li> <li>• deal with any enquiries, messages or other correspondence from you</li> </ul>
<ul style="list-style-type: none"> <li>✓ Your first and last name</li> <li>✓ Your e-mail address</li> </ul>	<p>To enable us to send you information about services of ours which may be of interest to you:</p> <ul style="list-style-type: none"> <li>• by email; or</li> <li>• via social media</li> </ul>	<p>To enable us to pursue our legitimate interests to promote our services to you.</p>

<b>Website Users</b>		
<b><i>Type(s) of personal information we process</i></b>	<b><i>Why we process this personal information</i></b>	<b><i>Our legal basis for processing this personal information</i></b>
<ul style="list-style-type: none"> <li>✓ Information we collect from your device when you use the RTC Website such as:               <ul style="list-style-type: none"> <li>• technical information;</li> <li>• information about your visit to and use of the RTC Website; and</li> <li>• cookies or other tracking technologies</li> </ul> </li> </ul>	<p>To allow us to analyse how RTC Website works (for example by carrying out research, statistical analysis and troubleshooting)</p> <p>To ensure that the RTC Website is presented in the best way for you and for your device</p> <p>To enable us to understand how you use the RTC Website</p> <p>To keep the RTC Website secure and to prevent fraud</p>	<p>To enable us to pursue our legitimate interests to:</p> <ul style="list-style-type: none"> <li>• understand how the RTC Website is used;</li> <li>• improve the RTC Website;</li> <li>• keep the RTC Website secure; and</li> <li>• prevent fraud</li> </ul>



## **More about the information we use and why (this section only applies if you are in the EU or the UK)**

If you are in the EU or the UK, where we have a legal basis to process your personal information (as explained in the tables above), this Policy fulfils our duty to use that information fairly and lawfully and in a way that you would expect bearing in mind the services we are providing to you and your employer. It is intended to give you proper notice and explanation of the way in which your personal information will be used.

Where you provide us with other people's personal information as an employer or otherwise (for example, if you provide us with other employees' email addresses), **you must notify them before doing so.**

If you have any questions or you need any further information regarding how we use your information, please contact us (see [HOW TO CONTACT US](#)).

## SHARING / ENABLING OTHERS TO PROCESS YOUR INFORMATION

We have implemented an internal Data Sharing Policy, which sets out when and how your information may be shared. We will only share your information in accordance with that policy.

### **When and why might you share my personal information with others?**

In order to operate the RTC Website and provide our services to you or your employer, we use a third party, Sota Solutions Ltd to provide us with IT support services. In doing so, Sota Solutions Ltd may process your information. However, Sota Solutions Ltd can only access our servers via a login and with our permission.

We make sure that Sota Solutions Ltd takes security measures to protect your information in line with our policies. We do not allow it to use your personal information for its own purposes and we only permit it to process your personal information as is necessary and in accordance with our instructions.

### **Who else might obtain my personal information?**

In some circumstances, we may need to give certain information about you to a data protection regulator or in order to comply with the law or a legal process (including law enforcement or government agencies). We may also do so where we have another legitimate interest that is not overridden by your interests and fundamental rights (for example, to maintain the security of our computer systems).



## RETAINING YOUR INFORMATION (this section only applies if you are in the EU or the UK)

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting obligations.

To decide how long we keep your information, we consider the type and amount of information you give to us or which we collect, and how sensitive that information is. We also consider the risk of harm that might occur if the information went missing or if somebody used it in a way they were not supposed to, for example, and the reasons why we are using your information in the first place.

In some circumstances, we may anonymise your information, which means that it is no longer connected to, or about, you. If we do this, we may use this information without any further permission from you. Even if you ask us to delete your information, we may still need to keep it in a form that does not identify you (see [YOUR RIGHTS](#)).

We will keep your information for the following periods, unless we tell you otherwise (or you ask us to delete your information):

- ***Business Contacts:***

- *if you work for one of our suppliers, customers or partners, and correspond with us on their behalf, we will retain copies of that correspondence for so long as we reasonably require it for our business purposes or for legal reasons. If you or your employer notify us that you have left that organisation, we will delete your contact details within 3 months of such notification.*
- *if we have contacted you or you have contacted us about prospective business (including via our online contact form), but it hasn't resulted in a contract, we will usually delete your personal information within three years of the date on which we last communicated with you for any reason.*

- ***Website Users (but not Business Contacts):***

- *we will delete your cookie preferences and any other information we collect from your device within one year of the date of your last visit to the RTC Website.*

We may also keep certain information (for example, your name, job title and e-mail address) for longer periods than those stated above if you have agreed to us using it, for example, for keeping in touch about our other products or services, or for our promotional purposes.



Please contact us if you would like further details on how long we keep your information (see [HOW TO CONTACT US](#)).

### TRANSFERRING YOUR INFORMATION OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA ("EEA") **(this section only applies if you are in the EU or the UK)**

If you are a **Business Contact**, we may need to transfer and process your information outside the UK and the EEA. For example, where it is necessary to do so, we will transfer your information to our other group companies to enable them to access and manage contracts with you or your employer, and to contact and liaise with you and your employer.

If you are a **Website User**, we may need to transfer and process your information outside the UK and the EEA. For example, our group company in the US may access some of your information because it is responsible for operating the RTC Website.

We take reasonable precautions to ensure that your information will receive an adequate level of protection whenever it is transferred outside the UK or EEA, and that it will be treated in a way which is consistent with EU and UK data protection laws. For example, we have put in place a contract between our group companies which incorporates EU-approved clauses, giving you rights in relation to the information that is transferred. We have also implemented a Data Sharing Policy, which all our group companies adhere to.

Please contact us if you would like further details (see [HOW TO CONTACT US](#)).

### KEEPING YOUR INFORMATION SECURE

All information that you provide to us is stored on secure systems and servers. We have put in place measures to protect your information.

However, information which is sent via the internet can never be completely secure. While we do our best to protect your information, we cannot guarantee the security of any information which is sent by e-mail or via the RTC Website. This is done at your own risk.

If you are worried that your information might be at risk, please contact us (see [HOW TO CONTACT US](#)).





## UPDATING AND ACCESSING YOUR INFORMATION **(this section only applies if you are in the EU or the UK)**

If you are in the EU or the UK, you have the right under EU and UK data protection laws to access personal information held about you, subject to certain conditions, and to ask for it to be changed or deleted.

If you have any questions about accessing, changing or deleting your personal information, please contact us (see [HOW TO CONTACT US](#)).

To learn more about the rights you may have in relation to your personal information see [YOUR RIGHTS](#).

## YOUR RIGHTS **(this section only applies if you are in the EU or the UK)**

If you are in the EU or the UK, by law you have the right to:

- request access to your personal information (commonly known as a “data subject access request”). You can request a copy of the personal information we hold about you and check that we are lawfully processing it;
- request correction or deletion of your personal information (unless we have the legal right to retain it). You also have the right to ask us to delete or remove your personal information where you have objected to our processing of it (see below);
- object to processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which leads you to object to the processing of your information. You also have the right to object where we are processing your personal information for direct marketing purposes;
- request the restriction of processing of your personal information. You can ask us to temporarily stop processing personal information about you, for example if you want us to establish that it is accurate or the reason for processing it;
- request us to transfer to someone else personal information that you have provided to us; and
- change your information processing preferences at any time (where this specifically relates to marketing messages, see [MARKETING](#)).

If you want to exercise any of the rights listed above, please contact us (see [HOW TO CONTACT US](#)).



## **No fee usually required to access your personal information**

You will not normally have to pay a fee to access your personal information (or to exercise any of the other rights set out above). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, in such circumstances we are entitled to refuse to comply with the request.

## **What we may need from you**

We may need to request specific information from you to confirm your identity and verify your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## MARKETING **(this section only applies if you are in the EU or the UK)**

From time to time we may send you marketing messages by email or via social media platforms such as LinkedIn. These messages will only ever relate to services of ours which may be of interest to you (including, for example, promotional materials and updates).

See [HOW WE USE YOUR INFORMATION AND OUR LEGAL BASIS FOR DOING SO](#) for details of the lawful basis on which we rely to process your information in connection with this marketing.

You have the right to opt-out of our marketing at any time (see [HOW TO CONTACT US](#)).

## OTHER WEBSITES

For **Website Users**: the RTC Website contains links to other websites such as LinkedIn, Facebook and YouTube. This Policy only applies to the RTC Website so when you link to other websites you should read their own privacy policies.

## CHANGES TO THIS POLICY

This Policy was last updated in February 2020.

We will update this Policy from time to time and will post any updates on the RTC Website. If you don't agree with those changes, you can always stop giving us any more of your information and stop using the RTC Website.



## HOW TO CONTACT US

If you have any questions about this Policy or how we handle your personal information please contact our data protection leader, Corinne Glover, at [cglover@rtc.com](mailto:cglover@rtc.com).

RTC is a “data controller” when it comes to the handling of your personal information. This means that we are responsible for deciding how we hold and use personal information about you.

RTC is registered with the UK Information Commissioner’s Office with the registration number: Z9926158.

### **Complaints (this section only applies if you are in the EU or the UK)**

If, for any reason, you are not happy with the way that we have handled your personal information, please contact us at the address set out above. If you are still not happy and if you are based in the UK, you have the right to make a make a complaint to the Information Commissioner’s Office see: <https://ico.org.uk/global/contact-us/>.