

Richard Newton Consulting Privacy Policy May 2018

Your right to privacy

Your right to privacy is very important to us. We take the security of your information seriously and have strict policies and processes in place to ensure it remains safe. This guide describes the way we collect information, how we use it and how we protect it.

RNC is committed to complying with the Data Protection Act 1998 as well as the European General Data Protection Regulation (GDPR). RNC will only process (i.e. collect, store and use) personal data in a manner that is compatible with the Data Protection Act 1998 and GDPR. Our intention is that we will handle personal data fairly and lawfully with justification.

We will respect your privacy and will only process your information to support our engagement with you. We endeavour to ensure that our information is accurate, relevant, adequate and not excessive. We have a member of staff responsible for Data Protection Officer who ensures the fair processing of your information in line with the regulations, whom you can contact using the contact details at the end of this guide. You also have the right to complain to the ICO if you have any concerns.

Personal Data

Personal data is defined as any data, which relates to a living individual who can be identified:

- From the information held, or
- From the information combined with any other information which is already in the possession of, or likely to come into the possession of, the person or organisation holding the information
- Personal data also includes any expression of opinions about an individual, and any indication of the intentions of the data controller (i.e. Positive Solutions) or any other person in respect of the individual.

Examples of personal data include:

- Names and address details
- National insurance number
- Bank account details
- Dates of birth
- Telephone numbers
- Email addresses

We collect personal information about you when you make use of our services.

In order to carry out our business, we hold data in relation to personal details such as:

- Names
- Addresses
- Telephone numbers
- Email addresses
- Employment details
- Education and qualification history
- Financial details
- Information to enable us to process an application and set you up as a client on our system

- Information about the services you use, and other related information
- Information to enable us to process payments for you, for example bank and credit or debit card details
- Records of contact with you, such as system notes, emails and letters

The information is held for the following purposes

- Staff administration
- Advertising, marketing and public relations
- Recruitment

Personal Data we handle

In order to carry out our business we handle personal data from a range of individuals. This includes:

- Staff
- Suppliers
- Enquirers
- Advisers
- Consultants and other professional experts
- Former and potential members of staff
- Business or / other contacts

How We Collect Information About You

The information we collect about you comes from:

- Information you have given to us during the course of our engagement with you
- Forms you have completed and given to us
- Information that you have given us over the telephone
- Emails that you have sent to us
- Details of any checks we have made to ensure the accuracy of the information we hold

We will only collect, use, hold or disclose personal information where we have a lawful basis to do so. This means information needed to provide you with a product or service, to satisfy legal or regulatory requirements, or where we have your consent. We will use your information to:

- keep our records up to date
- keep you informed of other relevant products or services that may be of interest to you where you have provided consent for us to do this

Sharing information

Any disclosures of personal data are always made on case-by-case basis, using the personal data appropriate to the specific purpose and circumstances and with the necessary security controls in place.

Information is only shared with those organisations who have a need to know, and with the consent of the individual concerned where appropriate.

It may be necessary to share information with our partner third parties to:

- Arrange the supply of products and services recommended
- Check the accuracy of the data we hold
- Ensure we meet our statutory and regulatory legal obligations, including those related to diversity