

# Introduction

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Rushmon Limited is pleased to provide the following Privacy Notice:

## Personal Data

Rushmon uses the information collected from you to provide quotations, make telephone contact and to email you marketing information which Rushmon believes may be of interest to you and your business. In you making initial contact you consent to Rushmon maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services. Rushmon also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Rushmon will be acting on the instruction of its client, and will work hard to ensure that the client is fully GDPR compliant.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses. Rushmon may from time to time use such information to identify its visitors. Rushmon may also collect statistics about the behavior of visitors to its website.

Rushmon's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Joomla.org and Google.com use cookies to help Rushmon identify and track visitors and their website access preferences. Rushmon website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Rushmon's website.

Any information Rushmon holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

Rushmon will only collect the information needed so that it can provide you with services. Rushmon does not sell or broker your data, although coincidentally there may be times when your information could be contained in data that Rushmon has purchased from a third-party list broker.

## **Legal basis for processing any personal data**

To meet Rushmon's contractual obligations to clients and to also respond to marketing enquiries.

## **Legitimate interests pursued by Rushmon**

To promote the services offered by Rushmon and/or to market the services and/or products offered by Rushmon.

## **Consent**

Through agreeing to this privacy notice you are consenting to Rushmon processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing [dataprotection@rushmon.co.uk](mailto:dataprotection@rushmon.co.uk) or writing to us. See last section for full contact details.

## **Disclosure**

Rushmon may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Rushmon requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

Rushmon do not broker or pass on information gained from your engagement with it without your consent. However, Rushmon may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. Rushmon may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Rushmon, its clients and customers and/or the wider community.

## **Retention Policy**

Rushmon will process personal data during the duration of any contract and will continue to store only the personal data needed for five years after the contract has expired to meet any legal obligations. After five years any personal data not needed will be deleted.

## **Data storage**

Rushmon uses Microsoft's Office 365 cloud technology as well as cloud based technology from other IT Service suppliers for email, accounting and other data storage services. Additionally we store data on our own premises and in a secure shared backup facility in the UK. Whilst Microsoft have server centres around the world, our Office 365 data is normally held and processed in the UK. However it is possible, particularly during service outages in the UK, that Microsoft may choose to process data in data centres outside the UK. As such Data may be held at least temporarily in other EEA countries and/or the USA using

different (multiple) servers. The same is true of the other cloud based services we use. Where data may be held in the USA, to satisfy the requirements relating to the transfer of data from the EEA to the US, we ensure that our service providers have agreements in place with their hosting providers that use European Commission model contract clauses.

## **Your rights as a data subject**

At any point whilst Rushmon is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Rushmon refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Rushmon at your request can confirm what information it holds about you and how it is processed

## **You can request the following information:**

- Identity of and contact details for the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Rushmon or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## **To access what personal data is held, identification will be required**

Rushmon will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Rushmon is dissatisfied with the

quality, further information may be sought before personal data can be released.

All requests should be made to [dataprotection@rushmon.co.uk](mailto:dataprotection@rushmon.co.uk) or by phoning +441932 586700 or by writing to us at the address further below.

## **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Rushmon or its partners, you have the right to complain to Rushmon's CEO. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Rushmon Limited for the attention of the CEO  
2 Esher Road  
Walton on Thames  
Surrey KT12 4JY.

Telephone +441932 586700 or email [dataprotection@rushmon.co.uk](mailto:dataprotection@rushmon.co.uk)

Data Protection Regulator  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Telephone 0303 123 1113 or <https://ico.org.uk/concerns/>