

# Privacy notice



## How we use your information

This privacy notice tells you what to expect when RSE Insight Ltd collects and processes personal information. It applies to information we collect about people who enquire about or use our services, eg email us, use products we sell or subscribe to our newsletter and from visitors to our websites.

## What is the purpose of the processing and what is the lawful basis for processing:

The purpose of the data is to facilitate normal business operations.

The lawful basis for the processing is legitimate interest. The legitimate interest of RSE Insight Ltd in processing the data is to facilitate normal business operations, which would not be possible without the processing of such data.

With respect to the CASPA newsletter, the legitimate interest is consent. Newsletters will only be distributed to email addresses explicitly subscribed via [www.caspaonline.co.uk](http://www.caspaonline.co.uk).

## What personal data do we process:

We may process personal information on any individual who has ever had any business dealings with us directly, or in the delivery of services under the terms of the Royalty Agreement between SGA Systems Ltd and RSE Insight Ltd. In most cases, personal information will be limited to

- an individual's name
- any email addresses provided for us to maintain contact
- any telephone numbers provided for us to maintain contact
- the organisation they work for, where provided

When providing support to customers, certain technical queries may require us to receive and process data files explicitly sent to us by the customer which may include personal data and sensitive personal data and may only be sent to us where a data processing agreement already exists.

## Where did the data we process come from:

Where we act in the role of a customer for professional services, information on individuals may have come from their employers website or from information provided by the individual once contact had been established.

Where we act in the role of a supplier, information on individuals will have come from contact initiated by the individual, or from normal business activities in the course of fulfilling contractual obligations to customers.

Where the CASPA evaluation version is downloaded, the details recorded by the downloader are recorded to support any further contact from that user.

When someone visits [www.rseinsight.co.uk](http://www.rseinsight.co.uk) or [caspaonline.co.uk](http://caspaonline.co.uk) we use a third party services, Google Analytics and Cloudflare to identify individual users browsers. No Personally Identifiable Information (PII) is recorded. Search queries and results are not logged.

We use a third party service, WordPress.com, to publish our websites. These sites are hosted at 1&1 and Shotgun Front respectively. We use standard WordPress services to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

We use a third party provider, Createsend, to deliver and track our occasional newsletters. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our newsletter. For more information, please see [Createsend's privacy notice](#).

Personal data of the types noted above may also be shared with or transferred from SGA Systems Ltd for the purpose of supporting the licensing of the CASPA software product to end-users under the terms of the Royalty Agreement between SGA Systems Ltd and RSE Insight Ltd.

## **With whom is it shared:**

Where personal data forms part of relevant business documentation, e.g. a customer's name and email address on an invoice, information may be shared with organisations contracted by us to provide professional services, e.g. accountancy, and with other organisations where a statutory duty exists, e.g. disclosure of business documents to HMRC.

## **Transfers to third countries:**

Personal data is not transferred to any third country.

## **How long is the data retained for:**

Where data forms part of a business record whose retention is mandatory in order to fulfil statutory obligations, such records will be kept for a minimum of six years in order to comply with UK tax legislation.

Where data files have been sent to us to resolve technical issues noted above, we will retain this data for fourteen days after the issue has been resolved, after which it will be securely deleted.

In all other cases, data will be retained for as long as the company sees fit.

## **Individual rights:**

The GDPR provides the following rights for individuals:

- the right to be informed
- the right of access
- the right to rectification
- the right to erase
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and profiling

For further information on these rights and the circumstances in which they apply, please refer to guidance provided by the Information Commissioner at <https://ico.org.uk> or Regulation (EU) 2016/679 of the European Parliament.

## **Automated decision making and profiling:**

We do not process data for the purposes of automated decision making and profiling.

## **Complaints:**

Any concerns about the data we hold or the way in which we process that data should, in the first instance, be directed to us via the contact details at the end of this document. Please note that if you are contacting us in regard to one of the individual rights listed above, the GDPR sets out the timescales for response and the circumstances in which requests must be acceded to.

If you still have concerns, the GDPR provides the right to lodge a complaint with a supervisory authority, which in the UK is the Information Commissioner. Please refer to their website for more information, <https://ico.org.uk>

## **How to contact us**

If you want to request information about our privacy policy you can email us using [data.controller@rseinsight.co.uk](mailto:data.controller@rseinsight.co.uk) or write to us at RSE Insight Ltd, PO Box 162, Alresford SO24 4BD

15<sup>th</sup> March 2018