

## PRIVACY AND COOKIE POLICY

Your personal data is important to both you and us and it requires respectful and careful protection. This privacy policy applies to information held about customers and possible future customers, suppliers and possible future suppliers, contacts and all other people we hold personal data about. By 'personal data' we mean personal information that can identify you as an individual. 'You' means the person the information relates to. This policy contains important information on who we are, how and why we collect, store, use and share your information, your rights in relation to your information and how to contact us and supervisory authorities in the event of a complaint.

### WHO WE ARE

The Ridgewall Group of companies incorporates Ridgewall, QDOS-SBL, NOMIS Connections, Connecting London and Telnet.

We are one of the UK's leading providers of Connectivity and Cloud Solutions, Unified Communications, Print Management Services, Cyber Security and Professional Services, delivering reliable solutions for our customers.

We are registered with the Information Commissioner's Office: ICO registration: Z2539199.

Our Registered Office contact details are:

The Ridgewall Group Ltd.  
Devonshire House  
60 Goswell Road  
London  
EC1M 7AD  
Telephone: 0800 2800 365

### THE INFORMATION WE COLLECT

We collect, use and share information about you in order to respond to your enquiries, to provide you with information related to your enquiry and other services that may be of interest and to provide you with services and products you have asked for. The information may include any of the following personal data: name, address, company, email address, telephone number, payment information, voice recordings of calls to our helpdesk, CCTV recordings where in situ. To read more about additional information collected from visitors to our website please refer to the 'Cookies' section.

You may have provided this information directly to us through the following ways:

- completing the contact form on our website
- calling or visiting one of our offices
- speaking directly to us at an event or meeting
- writing to us
- emailing us

We may also receive your information from a third party e.g. one of our product or service partners

Sharing your information with us is essential for you to be able to communicate with us, for us to provide our services, to comply with contractual obligations and to keep you up to date with any changes and improvements to our products and services.

## HOW WE USE YOUR PERSONAL DATA

We use this data in any of the following ways:

- to communicate with you
- to provide our services to you
- to keep you informed about the products and services you hold with us and to send information about products and services you may be interested in
- to help us develop new and improved products and services to meet our client’s needs
- for security and to check your identity to comply with legal and regulatory obligations
- where we have a legitimate business need such as the protection of our business interests

Under data protection laws, whenever we process your personal information, we must meet at least one set condition for processing. These conditions are set out in data protection law and we rely on a number of different conditions for the activities we carry out.

We have listed below the purposes and the lawful basis for processing your information

How we may use your personal data	Lawful basis for processing			
	Contractual requirement	Legitimate interest	Consent	Legal requirement
<p>Clients, potential clients, suppliers, potential suppliers and others who communicate with us about our products and services: to communicate with you by email, phone, post or other digital methods.</p> <p>For example:                      -to manage customer, supplier and partner relationships                      -for the purpose of meeting contractual or regulatory requirements.                      -to keep you informed of changes or updates to your services                      -to respond to an enquiry through our contact us form on our website</p>	✓	✓		✓
Clients, potential clients, suppliers, potential suppliers and others who communicate with us: to handle enquiries and complaints.	✓	✓		
Clients on our marketing list: to contact you with marketing information and offers relating to the products and services offered by us that we think may be of interest.	✓	✓		
Potential clients and those on our marketing list: to contact you with marketing information and offers relating to the products and services offered by us that we think may be of interest where you have opted in to receiving marketing material.			✓	

<p>Clients: to recover any debts you owe us and enforce other obligations we are entitled to under contract and to protect ourselves against harm to our rights and property interests. Where it is in our legitimate interest to ensure our business is run with due diligence and we are capable of recovering the debts owed to us.</p>		✓		✓
<p>Clients: to undertake checks for the purposes of detecting and preventing fraud, and money laundering, to verify your identity and credit worthiness before providing services to you.</p>		✓		✓
<p>Suppliers and service providers: to undertake checks for the purposes of detecting and preventing fraud, and money laundering, to verify your identity and sustainability before purchasing products or services from you. We store your data in our secure database.</p>		✓		✓
<p>Suppliers and service providers: to carry out our contractual obligation to make payments to you for products and services we have purchased. To maintain financial transaction records.</p>	✓			✓
<p>Supplier and service providers: to maintain records of supplier and service provider compliance checks e.g. checks of your professional competence and insurance documentation. To ensure our business is run with due diligence, to protect our business interests and the interests of our customers.</p>		✓		✓
<p>Recordings of calls to our helpdesk or service desk: to support training and dispute resolution, we may record your interaction with us over the phone.</p>		✓		✓
<p>Recordings of CCTV images: CCTV may be in place at our premises to provide a deterrent to break ins and criminal damage and to support investigations by the police into criminal acts if required.</p>		✓		

### SENSITIVE DATA

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

### WHO WE SHARE YOUR DATA WITH AND WHY

We may share your information with:

- any company within the Ridgewall Group, for the purposes set out in this Privacy Notice, (e.g. customer relationship management and to provide you with any information, applications, products or services that you have requested);
- our service providers (including their sub-contractors) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing

providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;

- partners, including system implementers, independent software vendors that may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;
- third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions and transaction beneficiaries;
- third parties where you have a relationship with that third party and you have consented to us sending information (for example third party application providers);
- third parties for marketing purposes (e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities. For example, financial services organisations, payment solutions providers, software and services providers that provide business solutions);
- credit reference and fraud prevention agencies;
- regulators to meet Ridgewall Group's legal and regulatory obligations;
- law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- our own and Ridgewall Group professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- another organisation if we sell or buy (or negotiate to sell or buy) any business or assets;
- another organisation to whom we may transfer our agreement with you; and
- Government departments where reporting is mandatory under applicable law.

We may share non-personally identifiable information about the use of our website, applications, products or services publicly or with third parties but this will not include information that can be used to identify you.

We always share your data securely, and we won't share more than we need to.

## YOUR RIGHTS

The GDPR aims to give you more control of your personal data. It provides new and strengthened rights.

**Right to access** – you can ask us whether we're processing your personal data, including where and for what purpose. You can also request an electronic copy of your personal data free of charge. If you require further copies of the data there may be a charge where permitted by the legislation.

**Right to restrict processing** – in certain circumstances, you can ask us to restrict our use of your personal data.

**Right to rectification** – you can ask us to correct inaccurate personal data we hold about you.

**Right to erasure** (right to be forgotten) – in certain circumstances, you can ask us to erase your personal data.

**Right to data portability** – you can ask us to provide you with a copy of your personal data in a commonly used electronic format so that you can transfer it to other businesses.

**Right to object to automated decision-making** – in certain circumstances, you can ask us not to make automated decisions about you based on your personal data that produce significant legal effects.

**Right to lodge a complaint** – you can lodge a complaint with the supervisory authority ICO but we ask that you allow us to see if we can resolve the problem first (See complaints and queries section).

This means you can at any time you can:

- inform us of a correction to your personal data;
- withdraw any permission you have previously given to allow us to use your information;
- object to any automated decision-making;
- ask us to stop or start sending you marketing messages;
- ask us to send you (or someone you nominate) a copy of the information we hold about you;
- ask us to stop processing your information **in certain circumstances**.

## DATA SUBJECT ACCESS REQUEST (DSAR)

You have the right to request a copy of the personal data we hold about you and to have any inaccuracies corrected. We will require you to prove your identity with 2 pieces of approved identification. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

We will respond to your request within one month of you providing information that confirms your identity. If you can advise of the specific information that you require, we can process your request more quickly. We will then give you a description of your data, why we have it, who it could be disclosed to and if copies have been requested, they will be in a format that you can access easily.

If you wish to make a DSAR request please contact us using the contact details at the end of this notice and we will provide you with the necessary request documents.

## RETENTION OF YOUR DATA

We will retain your data while we have a relationship with you. Once our relationship has come to an end we will only retain your personal data for a period of time that is calculated depending on the type of personal data and the purposes for which we hold that data. We maintain a Retention of Records Schedule to communicate our record retention requirements to all relevant employees and ensure data is not retained for longer than necessary.

We only retain information that enables us to:

- maintain business records to comply with our contractual obligations
- comply with record retention requirements under the law
- defend or bring any existing or potential legal claims
- maintain records of anyone who does not want to receive marketing from us
- deal with any future complaints regarding services we have delivered
- if required to by law enforcement agencies

## HOW WE PROTECT YOUR PERSONAL DATA

We are committed to protecting your information. We take appropriate technical and organisational measures to guard against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data. Ridgewall are certified to ISO 27001 Information Security Management System.

The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. However, please bear in mind that IT infrastructure and the internet cannot be guaranteed to be 100% secure

We have access security measures in place and restrict access to databases only to those who need access appropriate to their job role.

All personal information and details provided as part of an enquiry, support or service request, or financial details are stored on a secure server. We do not store credit card numbers or related identifying information on any of our servers.

Digital data and hard copy data is securely disposed of when no longer required in line with our secure disposal of data process.

## COOKIES AND WHY WE USE THEM

A “cookie” is a small piece of information sent by a Web server to store in a Web browser so that it can later be read back from that browser. We may use cookies to store some personal preferences for your future visits. Cookies allow us to recognise you more quickly; therefore, your time spent on our site can be more personalised and productive. You’ll find that cookies are an industry standard and are used at most major Web sites in much the same way we use them on the Ridgewall website.

We may use third-party site usage tracking companies to analyse your Site visit or to conduct surveys e.g. Google Analytics. When visiting our website these third parties may place or recognise a unique “cookie” on your browser. These companies may use information (not including your name, address, e-mail address or telephone number) about your visits to our website and other Web sites in order to help us understand how to serve you better.

If you wish, you can prevent cookie files from using (non-personal) information about you by either deleting the cookie folder in your browser or by putting your browser’s Privacy setting higher, but doing so will mean that:

- your experience of this and other sites that use cookies to enhance or personalise your experience will be adversely affected, and
- you will not be presented with advertising that reflects the way that you use our, and other, sites.

You can find out how to make these changes to your browser at this site:

[www.allaboutcookies.org/manage-cookies/](http://www.allaboutcookies.org/manage-cookies/).

## QUERIES OR COMPLAINTS

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. Please get in touch if you think we are using or collecting your data in an inappropriate way.

You can call us on [0800 2800 365](tel:08002800365) and ask to be referred to the Privacy Manager or Operations Manager.

or you can email [privacy@ridgewall.co.uk](mailto:privacy@ridgewall.co.uk) or you can write to us at the address listed at the beginning of this document.

The supervisory body for the UK is the Information Commissioners Office (ICO)  
You can visit their website at: <https://ico.org.uk/> or contact them on: 0303 123 1113

## CHANGES TO THIS PRIVACY POLICY

We keep our privacy policy under regular review.

This Policy has been authorised by the directors of the board on 19/05/2022

*Alistair Kane*

CEO  
The Ridgewall Group.

## Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Directors	22/05/2018
2	Updated lawful purpose for processing table to add who the data is shared with	Directors	02/07/2018
3	Added ICO registration number	Directors	26/06/2019
4	Added statement relating to the Ridgewall Group	Directors	07/08/2019
5	Amended reference to DPO to Privacy Manager	Directors	28/10/2019
6	Updated logo to Group and reformatted document	Directors	08/04/2020
7	Updated logo to Group and reformatted document	Directors	01/12/2020