

Client Privacy Policy

The purpose of this Privacy Policy is to help the staff of our clients, current, future, and past, to understand what personal information we collect about them, what we use it for, and how we comply with data protection legislation. In the UK, that primarily means compliance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. Failure to comply with data protection legislation can lead to civil liability and criminal law penalties.

For the sake of clarity, if you have made a payment to a client of RSM 2000 through an RSM system then this policy does NOT apply to you. The data captured as part of a transaction for clients of RSM 2000 will be made available to that client and will be subject to the client's own privacy policies. We only act on the instruction of our clients when processing your data on their behalf, or insofar as our Web Privacy Policy applies. Enquiries regarding the use of your data by a client should be directed to them. Note RSM 2000 will not (except as detailed in our Web Privacy Policy) supply your details to any other third party or use your data for any other RSM 2000 business-related purposes.

RSM2000 Ltd. is committed to safeguarding the privacy of clients; this policy sets out how we will treat your personal data.

Note RSM 2000 will not (except as detailed within this policy) supply your details to any other third party or use your data for any other RSM 2000 business-related purposes.

Our Data Protection Officer is Mark Freeland.

If you have any questions regarding our Privacy Policy, please write to:

The Data Protection Officer
RSM 2000 Limited
Wrest House
Wrest Park
Silsoe
Beds MK45 4HS

Email: electronicpayments@rsm2000.co.uk

Or call our team: 01525 862 555.

What data do we collect?

We may collect, store and use the following kinds of personal data:

- If you login to our systems, data about your computer and about your visits to and use of this website, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views;
- Data that you, or your employer, may provide to us for the purpose of your employer's operation of our services. This data may include one or more of: name, role, email address, business postal address, mobile, landline, and fax telephone numbers, web-site URL.
- If you are required to submit identity data for the purposes of Client Due Diligence, data may, in addition to the above, include one or more of date of birth, home address, nationality and, depending on type of documentation provided:
 - Drivers' Licence: photograph, driving licence number;
 - Passport: photograph, passport number, date of issue, date of expiry, place of issue, nationality;
 - Government communications: unique identification number; tax references, etc;
 - Utility bill: utility account number, usage information, including call data in case of telephone bills;
 - Bank/Card statement: account number, sort code, balance and transaction information.

Where documents have been certified by a third-party witness, the name, address, and qualification to sign (e.g. 'Accountant') of the certifying witness may also be recorded.

- We may, where you consent to give them, also store links to your profiles on social media web-sites such as LinkedIn, Twitter and Facebook.
- Data provided via clients' websites and email footers.
- Any other data you choose to send us.

Using Your Personal Data

Personal data provided to us will be used for the purposes specified in this privacy policy. We may use your personal data as follows:

- To administer the provision of services to you or your employer, our Client. e.g. to verify your identity when we receive any communications or requests from you, to inform you of any operational issues, system changes and enhancements, or other information relating to the operation of the service(s) contracted by your employer, our client, and to seek information from the client regarding their use, or potential use, of the service.
- If you provide data for the purposes of Due Diligence, this may be used to establish credit-worthiness for personal guarantees, to confirm that you have not been disqualified from trading or acting in a position of control, and to complete Anti-Money Laundering and Counter Terrorist Fundraising checks. This data may be checked against Identity Verification Services, Sanctions lists, and other verification systems as required in order to confirm that you are who you claim to be and that you present no risk. This may include, with your knowledge and consent, a credit check. The information is used only to verify your identity and credence as a person of significant control of the client in representing the client during the initial sign-up stage and is kept on record for regulatory purposes. The data may be provided to Government or Law Enforcement Agencies upon request during investigations or proceedings by that Agency, for example, the Financial Conduct Authority.
- To keep a record of your relationship with us.
- To provide you with information about our work or our activities that you have agreed to receive.
- To manage your marketing preferences and, where you have given consent, send occasional targeted event reminders, newsletters and marketing communications by email, mail and/or SMS and to carry out targeted marketing on social media sites
- To understand how we can improve our services, products or information.
- To comply with financial regulations and the law.
- To deal with enquiries and complaints made by or about you relating to the operation of our services.
- To monitor sales pipelines and operational issues.
- Using Social Media sites to contact you at new employers after you have moved job for the purposes of identifying sales opportunities.

Other Disclosures

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we may disclose data about you:

- To the extent that we are required to do so by law.
- In connection with any legal proceedings or prospective legal proceedings.
- In order to establish, exercise or defend our legal rights (including providing data to others for the purposes of fraud prevention and reducing credit risk).

Except as provided in this privacy policy, we will not provide your data to third parties.

International Data Transfers

Data that RSM 2000 Ltd. collects may be stored, processed, and transferred between the different secure servers that we operate within the United Kingdom and the EEA and not to any other countries outside the EEA.

Security of Your Personal Data

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal data.

We will store all the personal data you provide on our secure servers. All electronic transactions you make to or receive from us will be encrypted.

Where we rely on sub-processors to process your data then we will only use services within the European Economic Area and subject to satisfactory security assessments.

You are responsible for keeping your password and user details confidential. We will not ask you for your password.

Policy Amendments

We may update this privacy policy from time to time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

Your Rights

You retain control of how we use your data and you have the right to ask us to stop processing your personal information, which we will do. In some circumstances, we may legally be required to retain your personal information for audit purposes. However, this will be discussed with you depending on your requirements. Please contact our Data Protection Officer if you have any concerns.

You also have the right to request a copy of the information we hold about you. If you want to access your information, please contact our Data Protection Officer.

Under the General Data Protection Regulation, which is expected to become law in the UK in May 2018, you are also granted a number of additional rights. These include:

- The right to rectification
- The right to erasure
- The right to data portability
- The right to object

For more information on these rights please read the relevant guidance issued by the ICO.

If you would like to make a complaint about how we process your personal data, please contact our Data Protection Officer.

If you are not happy with how your complaint is dealt with, you should contact the Information Commissioner's Office. Alternatively, you are entitled to make a complaint to the Information Commissioner's Office without first referring your complaint to us.

For further information please see the Information Commissioner's guidance.

Updating Data

Please let us know if the personal data which we hold about you needs to be corrected or updated.

Contact

If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email to enquiries@rsm2000.co.uk or by post to RSM 2000 Ltd, Wrest House, Wrest Park, Silsoe, Bedfordshire MK45 4HS. Tel. 01525 862555 Fax. 01525 862500.