

## DATA PRIVACY POLICY (DPP)

### 1. IMPORTANT INFORMATION ABOUT WHO WE ARE

#### 1.1 Purpose of this privacy notice

This privacy notice aims to give you information on how we may collect and processes your personal data, including any data:

- (i) you may provide
  - through sending us an email inquiring about our services;
  - through submitting your contact details via 'Contact Us' form on our Websites;
  - when you use our Websites and services; and/or
  - when you use our Referral Scheme available on the Websites.
- (ii) we may receive your personal data from users of our Websites who recommended our services to you through the Referral Scheme available on the Websites.

The Websites are not intended for children and we do not knowingly collect data relating to children.

#### 1.2 Websites

[www.inforhino.co.uk](http://www.inforhino.co.uk)

[www.findigl.com](http://www.findigl.com)

**1.3 Controller:** Info Rhino Limited, company number ( 07299641 ), whose registered address is at 14 Upland Road, the Gallery, East Dulwich, London.

#### 1.4 Contact details

[dpp@inforhino.co.uk](mailto:dpp@inforhino.co.uk) Data Protection Enquiry at Info Rhino

[dpp@findigl.com](mailto:dpp@findigl.com) Data Protection Enquiry at Findigl

[forgetme@inforhino.co.uk](mailto:forgetme@inforhino.co.uk) address for notifying us you wish to be removed from Info Rhino in accordance with this DPP

[forgetme@findigl.com](mailto:forgetme@findigl.com) address for notifying you wish to be removed from Findigl in accordance with this DPP.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### 1.5 Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### 1.6 Third-party links



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This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Websites, we encourage you to read the privacy notice of every website you visit.

### 2. THE DATA WE COLLECT ABOUT YOU

#### 2.1 Your personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which (i) you have chosen to provide us with when you contact us, or (ii) which we receive from users of our Websites who have recommended our services to you via Referral Scheme on our Websites. We have categorised this personal data together as follows:

- **Identity Data** includes first name, maiden name, last name or similar identifier, title and gender.
- **Contact Data** includes your address, email address and telephone number(s).
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

We do not aim to collect any special categories of personal data about you, which would include, for example, your race or ethnicity, sexual orientation, religion, political views, health conditions, criminal records and biometric data. If, however, you in fact provide us with any such special categories of personal data, then by submitting such data/information, we will assume that you are fine with our use of such data/information for (i) the purpose for which you have voluntarily provided such data/information, and (ii) any purpose that is reasonably compatible with the Purpose. You may withdraw that permission at any time by contacting us.

#### 2.2 How is your personal data collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data and Contact Data by corresponding with us by email, completing online forms including; 'Contact Us' form or 'Referral Scheme' form or 'Newsletter' form 'Simple contact' forms available on the Websites. This includes personal data you provide when you:
  - send us general enquiry about our services;
  - generally communicate and/or deal with us;
  - recommend us to a third party; and/or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.



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We collect this personal data by using cookies and other similar technologies. Please see our [Cookies Policy](#) for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties /users of the Websites that recommend our services to you via Referral Schemes on the Websites.

### 2.3 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following situations:

- where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests;
- Where it is necessary for the performance of a contract we've entered into with you;
- Where we need to comply with a legal or regulatory obligation.

### 2.4. Purposes for which we will use your personal data

The table below describes all the ways we plan to use your personal data the legal bases we rely on to do so.

Purpose/Activity	Type of data	Lawful basis
To review and respond to your inquiry.	(i) Identity (ii) Contact	Necessary for our legitimate interests
To store your contact details	(i) Identity (ii) Contact	Necessary for our legitimate interest
To store your referral communication to third parties, to whom you recommend our services	(i) Identity (ii) Contact	Necessary for our legitimate interest
To supply services to you	(i) Identity (ii) Contact	Necessary for performance of contract
To use data analytics to improve our website.	(i) Technical data	Necessary for our legitimate interests

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 3. DISCLOSURE OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out below.



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Third Party	Purpose for sharing
Trusted partners and sub-contractors we work closely with to assist with responding to your requests and provide services to you	(i) To review and respond to your inquiry (ii) To provide services to you
Service providers acting as processors who provide IT and system administration services.	(i) To review and respond to your inquiry (ii) To provide services to you
Lawyers and accountants, auditors and insurers who provide professional services	(i) To review and respond to your inquiry (ii) To provide services to you (iii) To comply with our legal obligation

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### 4. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 5. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### 6. YOUR LEGAL RIGHTS

##### 6.1 Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on this link to find out more about your rights – <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.



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If you wish to exercise any rights please contact us at using the contact details set out in clause 1.4 above.

### 6.2 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### 6.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### 6.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 5. GLOSSARY

### 5.1 Lawful Basis

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### 5.2 Your legal rights

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.



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**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

