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# RCT HOSTING INTERNET SOLUTIONS POLICY DOCUMENT

RCT Hosting GDPR Privacy Policy

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## CONTENTS

1. Introduction.....	3
2. Context .....	3
Data Controller .....	3
Data Processor .....	3
3. Why do we handle personal data? .....	4
Data Controller .....	4
Data processor.....	4
Whose Personal Data does RCT Hosting Internet Solutions handle? .....	5
Data Controller .....	5
Data processor.....	5
What types of Personal Data does RCT Hosting Internet Solutions handle? .....	6
Data Controller .....	6
Data processor.....	6
Where does RCT Hosting Internet Solutions obtain Personal Data? .....	7
Data Controller .....	7
Data Processor .....	7
How does RCT Hosting Internet Solutions handle Personal Data? .....	8
Data Controller .....	8
Data processor.....	8
How does RCT Hosting Internet Solutions ensure the security of Personal Data?.....	8
Who does RCT Hosting Internet Solutions disclose Personal Data to? .....	9
Data Processing Notice as Data Controller .....	9
What are the rights of Data Subjects? .....	10
Logging a concern .....	10
How long does RCT Hosting Internet Solutions retain Personal Data? .....	11
Data Controller .....	11
Data Processor .....	11
Monitoring .....	11
Contact us .....	11

## 1. INTRODUCTION

This document explains how RCT Hosting Internet Solutions or its brands obtains, holds, uses and discloses information about people ('Personal Data') [1]), the steps taken to ensure that it is protected, and also describes the rights individuals have in regard to their Personal Data handled by RCT Hosting Internet Solutions.

The use and disclosure of Personal Data is governed in the United Kingdom by the General Data Protection Regulation ('GDPR'), RCT Hosting Internet Solutions is registered with the Information Commissioner as a 'data controller' for the purposes of GDPR. As such RCT Hosting Internet Solutions is obliged to ensure that the organisation handles all Personal Data in accordance with GDPR.

RCT Hosting Internet Solutions takes that responsibility very seriously and takes great care to ensure that Personal Data is handled appropriately in order to secure and maintain individuals' trust and confidence in RCT Hosting Internet Solutions.

## 2. CONTEXT

### DATA CONTROLLER

RCT Hosting Internet Solutions is a Data Controller where information collected is for the exclusive use of RCT Hosting Internet Solutions. In these scenarios, RCT Hosting Internet Solutions either collects and controls Personal Data for the Legitimate Interests of both the Data Controller (RCT Hosting Internet Solutions) and the Data Subject or as part of a contract. This may be in the event that payments are taken for an enhanced service.

### DATA PROCESSOR

For most clients, RCT Hosting Internet Solutions acts strictly as a Data Processor at the instruction of the client, who is acting as Data Controller. In this scenario, RCT Hosting Internet Solutions collects any Personal Data as instructed by the Data Controller. This information is then presented to the Data Controller.

### 3. WHY DO WE HANDLE PERSONAL DATA?

#### DATA CONTROLLER

RCT Hosting Internet Solutions obtains, holds, users, and discloses Personal Data for the provision of services to support RCT Hosting Internet Solutions's business.

These include:

- Staff administration
- Staff recruitment
- Sales and Marketing including public relations, digital marketing and promotions
- Management of finance to and from RCT Hosting Internet Solutions including payments.
- Internal review, accounting and auditing
- Training
- Management of complaints
- Management of Information & communications technology systems
- Information provision
- Licensing and registration
- Research, including surveys
- Performance management
- Procurement
- System testing
- Security
- Health and safety management

#### DATA PROCESSOR

Where RCT Hosting Internet Solutions is the Data Processor, it collects Personal Data on behalf of the Data Controller. RCT Hosting Internet Solutions only collects Personal Data that it is instructed to, the information is then displayed securely and/or securely transmitted to the Data Controller for their purpose. In this scenario, Data Subjects must consult the Data Controller's Privacy Policy in order to consent to the Data Processing in an informed manner.

## WHOSE PERSONAL DATA DOES RCT HOSTING INTERNET SOLUTIONS HANDLE?

### DATA CONTROLLER

In order to carry out the purposes described above RCT Hosting Internet Solutions may obtain, use and disclose Personal Data relating to a wide variety of individuals including the following:

- Staff including volunteers, apprentices, agents, temporary and casual workers
- Job applicants
- Suppliers
- Clients
- Complainants, correspondents and enquirers
- Advisers, consultants and other professional experts
- Former and potential members of staff
- Other individuals necessarily defined in the course of RCT Hosting Internet Solutions enquiries and activity.

RCT Hosting Internet Solutions will only use appropriate Personal Data necessary to fulfil a particular purpose or purposes. It will collect the minimum information necessary to fulfil that purpose. Anyone working for RCT Hosting Internet Solutions may only use information which is necessary to carry out their official duties. Personal Data could be information, which is held on a computer, in a paper record, but it can also include other types of electronically held information.

### DATA PROCESSOR

As a Data Processor, RCT Hosting Internet Solutions processes the Personal Data of Data Subjects who are service users of the service provided for a contracted client.

## WHAT TYPES OF PERSONAL DATA DOES RCT HOSTING INTERNET SOLUTIONS HANDLE?

### DATA CONTROLLER

In order to carry out the purposes described, RCT Hosting Internet Solutions may obtain, use, and disclose Personal Data relating to or consisting of the following:

- Personal details such as name, address, mobile telephone
- Account or payment details
- Education and training details
- Employment details, including performance and development
- Financial details
- Goods or services provided
- Complaints, incidents and accident details
- Curriculum vitae including employment and educational details.

RCT Hosting Internet Solutions will only use appropriate Personal Data necessary to fulfil a particular purpose or purposes.

### DATA PROCESSOR

Where RCT Hosting Internet Solutions is the Data Processor, RCT Hosting Internet Solutions collects Personal Data on behalf of the Data Controller. RCT Hosting Internet Solutions only collects Personal Data that it is instructed to, the information is then displayed securely and/or securely transmitted to the Data Controller for their purposes.

An example of types of information requested would be:

- Name
- Contact details such as telephone number and email address

## WHERE DOES RCT HOSTING INTERNET SOLUTIONS OBTAIN PERSONAL DATA?

### DATA CONTROLLER

RCT Hosting Internet Solutions may obtain Personal Data from a wide variety of sources, including the following:

- The individual data subjects
- Current, past or prospective employers of the individual
- Education and training establishments
- Employees and agents of RCT Hosting Internet Solutions
- Suppliers, providers of goods or services
- Persons making an enquiry or complaint
- Legal representatives
- Auditors
- Financial organisations and advisors
- Credit reference agencies
- Trade, employer associations and professional bodies.
- The media
- Openly available information from the Internet
- Data processors working on behalf of RCT Hosting Internet Solutions
- Recruitment agencies

### DATA PROCESSOR

Individual Data Subjects.

## HOW DOES RCT HOSTING INTERNET SOLUTIONS HANDLE PERSONAL DATA?

### DATA CONTROLLER

In order to achieve our purposes, RCT Hosting Internet Solutions will handle Personal Data in accordance with GDPR. In particular, the company will ensure that Personal Data is handled fairly and lawfully with appropriate justification. RCT Hosting Internet Solutions will strive to ensure that any Personal Data used by the company or on RCT Hosting Internet Solutions's behalf is of the highest quality in terms of accuracy, relevance, adequacy, and non-excessiveness, is kept as up to date as required, is protected appropriately, and is reviewed and securely destroyed when no longer required. RCT Hosting Internet Solutions will also respect individuals' rights under GDPR.

### DATA PROCESSOR

Personal data is handed securely at rest and in transit at the behest of the Data Controllers and in accordance with the requirements of GDPR. Where access and or amend requests are given the company will ensure that changes, once validated, are within the required timeframes.

## HOW DOES RCT HOSTING INTERNET SOLUTIONS ENSURE THE SECURITY OF PERSONAL DATA?

RCT Hosting Internet Solutions takes the security of Personal Data under the company's control very seriously. RCT Hosting Internet Solutions will comply with the relevant parts of the GDPR relating to security and seek to comply with articles 32-34.

RCT Hosting Internet Solutions will ensure that appropriate policies, training, technical and procedural measures are in place, including audit and integrity monitoring, to protect manual and electronic information systems from data loss and misuse, and only permit access to them when there is a legitimate reason to do so and then under strict guidelines as to what use may be made of any Personal Data contained within them. These procedures are continuously managed and enhanced by RCT Hosting Internet Solutions to ensure up-to-date security.



## WHO DOES RCT HOSTING INTERNET SOLUTIONS DISCLOSE PERSONAL DATA TO?

When Data Subjects provide information, they will be told what it will be used for and whom it will be shared with. RCT Hosting Internet Solutions may disclose, or enable access by other parties, including those from whom Personal Data is obtained as listed above. This may include disclosures to bodies or individuals working on behalf of RCT Hosting Internet Solutions such as support contractors or partners. However, RCT Hosting Internet Solutions will not supply these organisations with your information unless it is satisfied that equal measures are in place to protect the information from unauthorised access.

Disclosure of Personal Data will be made on a case-by-case basis, using the Personal Data appropriate to a specific purpose and circumstances, and with necessary controls in place. Where monies are due or outstanding RCT Hosting Internet Solutions reserves the right to use all the available information at its disposal to protect its business interests.

RCT Hosting Internet Solutions will not supply your information to any organisation for marketing purposes without your prior consent.

RCT Hosting Internet Solutions periodically undertakes surveys through online survey systems. Respondents should satisfy themselves regarding the privacy notices associated with any third party software provider.

RCT Hosting Internet Solutions will also disclose Personal Data to other bodies or individuals when required to do so by, or under any act of legislation, by any rule of law, and by court order. RCT Hosting Internet Solutions may also disclose Personal Data on a discretionary basis for the purpose of, and in connection with, any legal proceedings or for obtaining legal advice.

## DATA PROCESSING NOTICE AS DATA CONTROLLER

Data Controller Name: RCT Hosting Internet Solutions

Data Controller Email: [mail@rcthosting.com](mailto:mail@rcthosting.com)

Data Controller Website: <https://www.rcthosting.com>

## WHAT ARE THE RIGHTS OF DATA SUBJECTS?

Under GDPR individuals have the following rights:

- The rights to be informed
- The right to access
- The right to rectification
- The right to erasure (right to be forgotten)
- The right to restrict processing
- The right to data portability
- The right to object

For further detailed information visit the Gov.uk website or the Information Commissioner's Office website.

## LOGGING A CONCERN

If individuals have any concerns regarding the way their Personal Data is handled by RCT Hosting Internet Solutions or the quality of their Personal Data they are encouraged to raise them with RCT Hosting Internet Solutions.

The Information Commissioner is the independent regulator responsible for enforcing GDPR and can provide useful information about GDPR's requirements. They should also be contacted if a Data Subject wishes to raise a concern with regard to how Personal Data is controlled or processes. The Information Commissioner's Office may be contacted using the following:

The Information Commissioner's Office  
Wycliffe House  
Wilmslow  
Cheshire  
SK9 5AF  
03031231113  
[www.ico.gov.uk](http://www.ico.gov.uk)

## HOW LONG DOES RCT HOSTING INTERNET SOLUTIONS RETAIL PERSONAL DATA?

### DATA CONTROLLER

RCT Hosting Internet Solutions keeps Personal Data as long as it is necessary for the particular purpose or purposes for which it is held and will be disposed of in a secure manner when no longer needed. Payment details are kept in line with the requirements of HMRC.

### DATA PROCESSOR

Where RCT Hosting Internet Solutions are the Data Processor, we keep the Personal Data on behalf of the Data Controller in line with their Data Retention Policies. This is on a case-by-case basis and RCT Hosting Internet Solutions encourages Data Subjects to refer to the particular Data Controllers' Privacy Policy.

## MONITORING

RCT Hosting Internet Solutions may monitor or record and retain telephone calls, text, emails and other electronic communications to and from RCT Hosting Internet Solutions in order to provide a help and support service. Monitoring may also be employed for legitimate business interests such as to deter, prevent, and detect inappropriate or criminal activity, to ensure security and to assist its Business Purposes.

## CONTACT US

Any individual with concerns over the way RCT Hosting Internet Solutions handles their Personal Data may contact the Data Protection Team as below:

FAO Data Protection Officer

RCT Hosting Internet Solutions, 82 Stuart Street, Treorchy, South Wales, CF42 6SN

[mail@rcthosting.com](mailto:mail@rcthosting.com)

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

[1] 'Personal Data' is defined under GDPR. In practical terms, it means information handled by RCT Hosting Internet Solutions that relates to identifiable living individuals. The information can be held electronically or as part of paper records and can include photographs. For ease of readers, this document refers to the handling, use, holding etc of Personal Data.