

Aurrigo Group PLC

Richmond Design and Marketing Limited

CUSTOMER PRIVACY NOTICE

ABOUT US and THIS NOTICE

This Privacy Notice is provided by Aurrigo Group PLC, Richmond Design and Marketing Limited, and any other group companies registered within the UK ("RDM" or "we", "our" or "us") who is a 'controller' for the purposes of the UK General Data Protection Regulation (EU) 2016/679 and the UK Data Protection Act 2018 (collectively referred to as the "**Data Protection Laws**"). This Privacy Notice applies to you as one of our customers or suppliers.

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about how we handle your personal data, our processing and your rights.

How to contact us

For information about any issue raised in this Privacy Notice, or if you have any questions about this Privacy Notice regarding: how we handle your personal data, or if you would like to exercise your rights, please contact us using the information set out below:

- Contact Name: Graham Keene – *Head of Corporate Development*
- Address: Unit 33, Bilton Industrial Estate,
Humber Avenue,
Coventry,
CV3 1JL
- Telephone number: 02476 635818
- Email: privacy@aurrigo.com

If you would like this Privacy Notice in another format (for example: audio, large print, braille), please also contact us.

Changes to this Privacy Notice

The Privacy Notice will be provided to you when you receive your contract with RDM. The latest version of our Privacy Notice can always be found at: <https://aurrigo.com/privacy/>

We may amend or update our Privacy Notice at any time. We will alert you via email and by publicising a notice on our website to draw the users' attention to any changes that are made.

Current version: V1 August 2022

1. WHAT PERSONAL DATA DO WE COLLECT?

- 1.1. If we deal with you as a current or prospective customer or client, we collect, use, store and transfer different personal information about you in order to provide any of our services and products to you or to prepare for entering into a contract with you. We do not collect personal information unless it is reasonable necessary for, or directly related to, one or more of our services or products we provide or functions we carry out.
- 1.2. Personal data means any information from which a living individual can be identified. The types of personal data we may collect from you includes (but is not limited to):
- 1.2.1. Name;
 - 1.2.2. Work address;
 - 1.2.3. Role/job title;
 - 1.2.4. Email address;
 - 1.2.5. Telephone numbers;
 - 1.2.6. Your occupation and place of work;
 - 1.2.7. Information required for anti-money laundering checks to be completed, such as identity documents (e.g. passport or driving licence);
 - 1.2.8. Feedback and customer service reviews;
 - 1.2.9. Analytical information about your use of our website, products or services.
- 1.3. We do not collect special category information (e.g. medical information, race or ethnic origin, religion) unless we have your consent.

2. WHY DO WE PROCESS YOUR PERSONAL DATA?

- 2.1. We use your personal data for the purposes set out in this Privacy Notice. We are allowed to do so on certain legal bases (please see section "How is processing your data lawful?" for further details).

Purpose	Explanation	Legal Basis
Our business functions or activities	<p>We collect, hold, use and disclose your personal data which is necessary to carry out our business functions or activities, including:</p> <ul style="list-style-type: none">• Providing various products and services relating to our business to you or someone else you know;	Legal obligation and legitimate interests

Purpose	Explanation	Legal Basis
	<ul style="list-style-type: none"> • Carrying out administration of your contract with us, for example invoicing, service performance, service issues, maintaining our internal records; • Collecting information from you when you complete a form, application or survey or contact us to ask for information; • Complying with our legal and regulatory obligations, such as establishing your identity in order to comply with anti-money laundering regulations and our other legal and regulatory obligations; • Checking whether you are eligible for the products and services; • Analysing our services and customer needs with a view to improving those services; and • Contacting you to provide a testimonial or a client satisfaction survey for us • Resolving disputes or legal claims 	
Information Gathering	<p>We may also collect information from you electronically, for instance through internet browsing, mobile or tablet applications. Each time you visit our website, we collect information about your use of the website. We may use cookies when you visit our website, which can record information to our site. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action.</p>	Legitimate interests, consent
Marketing	<p>We will use your details to provide you with information about other services that we offer that may be of interest to you.</p>	Legitimate interest (if you have already bought from us) or consent

3. HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

- 3.1. We store your personal data in different ways, including in paper and in electronic form. The security of your personal data is important to us. We implement appropriate technical and organisational measures in order to protect your personal data against accidental or

unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.

4. HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?

4.1. We are allowed to process your personal data based on the following legal bases for the purposes explained in this Privacy Notice:

4.1.1. **Legitimate Interests** – We are permitted to process your personal data if it is based on our "legitimate interests" i.e. we have a good, sensible, practical reason for processing your personal data which is in our interests. To do so, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion to your privacy is reduced as much as possible.

You can object to processing that we carry out on the grounds of legitimate interests. See the section headed "Your Rights" to find out how.

4.1.2. **Legal Obligation** – We are subject to legal obligations to process your personal data for the purposes of complying with applicable regulatory rules and to make mandatory disclosures to government bodies and law enforcement agencies.

4.1.3. **Consent** - Sometimes we want to use your personal data in a way that is entirely optional for you, such as when you give consent for us to place cookies on your device. On these occasions, we will ask for your consent to use your information. You can withdraw this consent at any time.

5. ORGANISATIONS THAT WE MAY SHARE YOUR PERSONAL DATA WITH:

5.1. In order to perform the functions and/or the activities described above, we may disclose your personal data to any of the persons or organisations described below:

5.1.1. Our related entities to facilitate our internal business processes;

5.1.2. Third party service providers who assist us in operating our business (including credit reporting bodies and technology service providers); Our financial advisors, legal advisors or auditors;

5.1.3. Organisations involved in a corporate re-organisation or involved in a transfer of all or part of the assets or business or organisation;

5.1.4. Organisations involved in the payments systems including financial institutions. Merchants and payment organisations;

5.1.5. Organisations which we need to help us discharge our legal obligations;

5.1.6. As required or authorities by law and/or where you have given your consent.

6. TRANSFERS OF YOUR PERSONAL DATA OUTSIDE OF THE UK:

- 6.1. We may need to transfer your personal data to overseas recipients, for example where our suppliers are based outside of the UK.
- 6.2. Prior to disclosing your personal data to an overseas recipient, we will take all reasonable steps to ensure that:
 - 6.2.1. The overseas recipient treats your information in accordance with the Data Protection Laws and only uses the information in accordance with our contract in place with them to keep it secure; and
 - 6.2.2. The overseas recipient is located in a jurisdiction which has data protection laws in place which are considered to offer an adequate level of protection to the Data Protection Laws or we put in place appropriate safeguards in accordance with the law to safeguard your privacy rights and give you remedies in the unlikely event of a security breach.
- 6.3. If you want to know more about how data is transferred, please contact us using the details in the section above.

7. RETENTION AND DELETION OF YOUR PERSONAL DATA:

7.1. We only retain your personal data for as long as we need for the purpose for which it was collected and will not retain your personal data for any longer than is necessary. Our current retention periods for data collected pursuant to this privacy notice are:

CATEGORY OF DATA:	RETENTION PERIOD:
Account details (including names, email addresses, job titles, financial information for the corporate customer)	7 years from the end of the customer/supplier relationship.
Contracts with suppliers/customers	7 years after termination of the relevant contract.
General correspondence (including emails) only	3 years from date of sending/receipt of correspondence.
Analytical Data - information about your use of our website, products and services.	3 years from the date of which the individual interacted with our website.
Feedback and Customer Service Data	3 years from the date of which the feedback/customer service review was received.

8. YOUR RIGHTS:

- 8.1. Under the Data Protection Law, you have the rights described below in this section under the Data Protection Laws. If you want to exercise any of your rights, please contact us (please see "How to contact us" section).
- 8.2. We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three (3) months.
- 8.3. We may 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.
- 8.4. Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Laws.
- 8.5. Right to object to processing your personal data: You may object to us processing your personal data where we rely on a legitimate interest as our legal ground for processing;
- 8.6. Right to ask us to stop contact you with direct marketing: You can ask us to stop contacting you for direct marketing purposes. If you would like to do so, please contact us. Alternatively, you can also click the "unsubscribe" button at the bottom of our marketing communications. It may take a number of days for this to take effect.
- 8.7. Rights to access personal data relating to you: You may ask to see what personal data we hold about you. To help us find the information easily, please provide us with as much information as possible about the type of information you would like to see. Information requested generally consists of:
 - 8.7.1. A copy of the personal data;
 - 8.7.2. Details of the purpose for which personal data is being or is to be processed;
 - 8.7.3. Details of the recipients or classes of recipients to whom the personal data is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
 - 8.7.4. The period for which personal data is to be held (or the criteria we use to determine how long it is held);
 - 8.7.5. Any information available about the source of that data; and
 - 8.7.6. Whether we carry out an automated decision-making, or profiling, and where we do, the information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

- 8.8. Right to correct any mistakes in your information: You can require us to correct any mistakes in the personal data that we hold. If you would like to do this, please let us know what information is incorrect and what it should be replaced with.
- 8.9. Right to restrict processing of personal data: You may request that we stop processing your personal data temporarily if:
- 8.9.1. You do not think that your data is accurate. We will start processing again once we have checked whether or not it is accurate;
 - 8.9.2. The processing is unlawful but you do not want us to erase your data;
 - 8.9.3. We no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
 - 8.9.4. You have objected to processing because you believe that your interest should override our legitimate interest.
- 8.10. Right to data portability: You may ask for an electronic copy of your personal data which we hold electronically and which we process when we have entered into a contract with you. You can also ask us to provide this directly to another party.
- 8.11. Right to withdraw consent: For the uses of data specified in this privacy notice, you have the right to withdraw consent you have given us at any point. This is a vital and necessary aspect of consent. To withdraw your consent, you can contact us at the details provided in the "How to contact us" section. Note that any processing carried out prior to the date of withdrawal of your consent will still be valid and any published personal data cannot be retracted.
- 8.12. Right to erasure: You can ask us to erase your personal data where:
- 8.12.1. you do not believe that we need your data in order to process it for the purposes set out in this Privacy Notice;
 - 8.12.2. if you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your data;
 - 8.12.3. you object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or
 - 8.12.4. your data has been processed unlawfully or has not been erased when it should have been.
- 8.13. Rights in relation to automated decision making: We do not make any automated decisions about you so these rights do not apply.

9. COMPLAINTS

- 9.1. It is important that you ensure you have read this Privacy Notice. If you do not think that

we have processed your data in accordance with this Privacy Notice, you should let us know as soon as possible.

- 9.2. Should you wish to make a complaint about the management of your personal data, please email us at privacy@aurigo.com. We will make a record of your complaint and take any necessary steps to ensure this is investigated and actioned accordingly.
- 9.3. We will acknowledge your complaint within seven (7) days and provide you with a decision on your complaint within thirty (30) days.
- 9.4. If you are dissatisfied with our response, you also have the right to complain to the Information Commissioners Office ("ICO"). Information on how to do this is available on the ICO's website at: www.ICO.org.uk.