



Customer Privacy Notice

We respect your privacy and are committed to protecting your information.

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as customers of our Company, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

Reaction Group is the data controller for any personal data that you supply to us as part of the services you are contracted to receive from us (collectively referred to as "Reaction Group" "we", "us" or "our" in this privacy notice). As our customer, you are our data subject. If you have any questions about this privacy notice, please contact either Gary Boyce, Business Director on 0203 885 2299 or Kim Baker, Human Resources Advisor on 0203 885 2358.

A. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. This includes where a person can be identified directly, such as a person's name and address, but can also be information where a person is identified in other ways, such as their place of work and job title.

As part of our business relationship with you, we may collect, use, store and transfer different kinds of personal data about you as follows:

- Your identity information such as your name, title, employment status, and how we contact you such as your billing address, email address and telephone numbers.
- Your financial details to include your bank account and payment card details and information about any transactions with you including payments to and from you and other details of products and services you have purchased from us.
- Technology and communication data which 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.

Data will be stored in a range of different places, including in our Customer Relationship Management (CRM) system, in the organisation's secure server and in other IT systems (including the organisation's email system).

B. TYPES OF DATA HELD

We collect information about you when you instruct us to provide our services; visit our website; and engage in business dealings with us.

C. HOW IS YOUR PERSONAL DATA COLLECTED?

We collect data and information about you in a number of ways to include:

- Information you provide as part of our relationship with you, whether in person at meetings, over the phone or email, or via correspondence through our website.
- Whilst you visit our website, we may automatically collect information and data about your computer or browsing equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.
- We may also collect personal data and information about you from other sources including:
- Google Analytics to collect information about our web traffic. This includes which pages have been visited and the number of visits.

D. WHY 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 circumstances:

- Where we have a business or commercial reason to use your personal information to enable us to provide our service to you. This is called “legitimate interests.” However our legitimate interests must not override your own rights and interests. 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);
- Where we need to comply with a legal or regulatory obligation;

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

E. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We will use your information for the purpose it has been provided to us. However, we may reasonably consider that we need to use your information for another reason if that reason is compatible with the original purpose. We may collect your personal information for the following reasons:

- to provide our services or products to you.
- to comply with our statutory and regulatory obligations;
- to deal with your feedback, query or complaint;

F. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

G. DISCLOSURES TO THIRD PARTIES

We may have to share your personal data with the parties set out below:

- Third parties as part of our legal services to you, for example Companies House, and HMRC;
- Our IT support and service providers;
- Law enforcement organisations and regulatory bodies to comply with our legal and regulatory requirements;

H. 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 employees, agents, contractors and other 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.

I. WHERE WE HOLD YOUR PERSONAL DATA

Your information will be held at our Head Office, and by our service providers. We will not transfer your data outside of the European Economic Area.

J. DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing.
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay.
- e) data is not kept for longer than is necessary for its given purpose.
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures.
- g) we comply with the relevant GDPR procedures for international transferring of personal data.

K. WHO HAS ACCESS TO DATA

Your information may be shared internally, including with members of the Sales Team, Accounts Team, and the Senior Management Team.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

L. PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

M. RETENTION PERIODS

We only keep your data for as long as we need it for, which, in regard to existing customers is for up to 6 years following the termination of our contract with you.

At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

N. YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- i. the right to be informed about the data we hold on you and what we do with it;
- ii. the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- iii. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- iv. the right to have data deleted in certain circumstances. This is also known as 'erasure';
- v. the right to restrict the processing of the data;
- vi. the right to transfer the data we hold on you to another party. This is also known as 'portability';
- vii. the right to object to the inclusion of any information;
- viii. the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact either Gary Boyce, Business Director via gary.boyce@reactiongrp.com or 0203 885 2299 or Kim Baker, HR Advisor via: kim.baker@reactiongrp.com or 0203 885 2358.

O. MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

P. DATA PROTECTION COMPLIANCE

Our Data Protection Officers are:

Gary Boyce, Business Director
Email: gary.boyce@reactiongrp.com
Telephone: 0203 885 2299

Kim Baker, Human Resources Advisor
Email: kim.baker@reactiongrp.com
Telephone: 0203 885 2358

Reaction Limited is committed to assessing and improving the impact of its activities, including the risk to, and expectations of all Stakeholders. Our Privacy Notice should not be read in isolation but cross-referenced with all relevant Reaction Limited policies. **The policy will be updated, at least, every 12 months.**

Kim Baker
Human Resources Advisor

Last reviewed 01/12/2021

The content of company policy documents may vary by source, however the principles and context remain unchanged and not open to alternative interpretation.

Issue:	Date:	Description of Amendment:	Authorised by:
00	01.12.2021	Original Issue	Kim Baker