

## **PRIVACY**

### **Introduction**

Renew Holdings plc ("Renew") respects your privacy and is committed to protecting your personal data. This privacy policy aims to give you information on how Renew collects and processes your personal data through your use of this website, including any data you may provide through this website. The Company shall comply with its legal obligations under the Data Protection Act 2018 (the '2018 Act') and the EU General Data Protection Regulation ('GDPR') in respect of data privacy and security.

It is important that you read this privacy policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them. You can download a pdf version of the policy [here](#).

### **1. Data protection principles**

Personal data must be processed in accordance with six 'Data Protection Principles.' It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

### **2. Who we are**

#### **Controller**

Renew Holdings plc is the controller and responsible for your personal data (collectively referred to as Renew, the "Company", "we", "us" or "our" in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

#### **Contact details**

Renew Holdings plc, 3175 Century Way, Thorpe Park, Leeds, LS15 8ZB  
[info@renewholdings.com](mailto:info@renewholdings.com)

#### **Complaints**

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. You can do this by contacting the Information Commissioner's Office directly at [www.ico.org.uk](http://www.ico.org.uk). This website has further information on your rights and our obligations.

We would, however, appreciate the chance to deal with your concerns directly so please contact us in the first instance.

#### **Changes to the privacy notice and your duty to inform us of changes**

We may change this policy by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 25 May 2018.

#### **Third-party links**

This website may include links to third-party websites, plug-ins and applications or store cookie files on your computer in order to deliver its service(s). Clicking on those links or enabling those connections may allow third parties to collect, store 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 website, we encourage you to read the privacy notice of every website you visit.

### **3. 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 and Contact Data when you subscribe to our News Alert service or request marketing to be sent to you.

#### **■ Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.

#### ■ **Third parties or publicly available sources**

We may receive personal data or technical data about you from various third parties and public sources as set out below:

- a. Analytics, storage, tools and media providers
- b. IP tracking service providers
- c. automated security and compliance tools
- d. Identity and Contact data from providers of data feeds and hosting services

## 4. The data we collect

Unless personally identifiable information is voluntarily submitted, the only information that we collect from visitors to this website is technical data. We use this data to measure site activity, to generate statistics and to improve our services and the information provided by our site.

- **Technical Data** includes, but is not limited to, 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.
- **Usage Data** includes information about how our website is used.

Voluntarily submitted personal data means any information about an individual from which that person can be identified:

- **Identity Data** includes first name and last name.
- **Contact Data** includes company name and email address.
- **Marketing Data** includes preferences in receiving marketing (e.g. news alerts) from us and your communication preferences.

## 5. How we use your personal data

**Technical data** is used to measure site activity, to generate statistics and to improve our services and the information provided by our site

**Voluntarily submitted personal data** is used only when the law allows us, to:

- To fulfil the visitor's request, or for the purposes indicated on the page where the information is requested.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Below is a description of the ways data may be used and the reasons for that use:

	<b>Type of Data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
<b>To administer and protect our business and this website</b> This includes troubleshooting, data analysis, testing, system maintenance and data hosting	(a) Technical data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
<b>To use data analytics</b>	(a) Technical data (b) Usage data	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
<b>To provide regulatory news (RNS) via an automated email alert service</b>	(a) Identity data (b) Contact data (c) Marketing data	Necessary for our legitimate interests and as you have requested to receive RNS announcements

## Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site about aspects of your visit. 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. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). For more information about the cookies we use, please see our cookie policy.

## 6. Disclosures of your personal data

We may have to share your personal data with internal and external third parties for the purposes set out in the table in section 5 above.

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.

## 7. 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.

## 8. Data breaches

The Company has processes in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur then the Company will document and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals, then the Company will notify the Information Commissioner's Office within 72 hours.

## 9. 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.

## 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, please see table below:

<b>Request access</b> (Subject Access Request)	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. The Company will respond within 30 calendar days unless the request is complex or numerous in which case the period in which the Company must respond can be extended by a further 2 months.
<b>Request correction</b>	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.
<b>Request erasure</b>	This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. 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.
<b>Object to processing</b>	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.
<b>Request restriction of processing</b>	This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish the data's accuracy.
<b>Request the transfer</b>	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.
<b>Withdraw consent at any time</b>	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.

If you wish to exercise any of the rights set out above, please contact us.

**No fee is usually required** You will not have to pay a fee to exercise any of the rights. However, we may charge a reasonable fee if your request is repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**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). We may also contact you to ask you for further information in relation to your request to speed up our response.

**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.

## Glossary

### Legitimate Interest

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).

### Comply with a legal or regulatory obligation

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

**Internal Third Parties**

Other companies in the Renew Group acting as joint controllers AND/OR processors and who are based in the UK and provide system administration services.

**External Third Parties**

- Digital service providers acting as processors, operating in the EU, who provide a number of services, including but not restricted to data feeds, hosting, SSL, data analysis, CRM, video streaming, social media and sharing services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.