



# PRIVACY POLICY

## RIDGEON NETWORK LTD

### ISO9001 & ISO27001

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#### Document History

Reference/Version	Date	Author	Reason/Changes
RN_PRIVACY_180326	26 March 2018	C.Ridgeon	To supplement Information Security Policy and show compliance with GDPR.
RN_PRIVACY_180405	05 April 2018	C.Ridgeon	Clarification on suppliers and transfers, section 4.
RN_PRIVACY_180416	16 April 2018	C.Ridgeon	Further updates for GDPR compliance.
RN_PRIVACY_180530	30 May 2018	C.Ridgeon	Added reference to All Applicable Data Protection laws and Data Protection Act 2018.
RN_PRIVACY_220609	09 June 2022	C.Ridgeon	Reviewed as part of continued ISO audits. No changes required.
RN_PRIVACY_240321	21 March 2024	C.Ridgeon	Website Privacy & Cookie Policy updated

# PRIVACY POLICY

## 1. OVERVIEW

This document covers Ridgeon Network Ltd's policy for the protection and processing of Personal Data in line with applicable law and legislation, including The General Data Protection Regulation (GDPR) and Data Protection Act 2018 implemented on 25<sup>th</sup> May 2018 or the equivalent UK law/legislation as and when it is implemented.

Ridgeon Network is primarily designated as a Processor for the provision of services to clients. However, in some cases (such as collecting form data on our website or emails received) we are the Data Controller, this Privacy Policy covers both scenarios where required.

## 2. Safeguarding

We implement appropriate security measures to protect Personal data. This includes the appropriate technical and operational/organisational measures to protected against unauthorised or unlawful processing, loss, destruction or loss of data.

## 3. Fair Processing

We will process data in accordance with the purpose of the service(s) being provided to clients and/or users. We will not use Personal Data for any other purpose than to provide and support the services you use, unless otherwise agreed.

## 4. Transfer of data

We may appoint sub-contractors to work on services that we provide but they are subject to the same policies as internal staff. We operate a UK-based server infrastructure and will not transfer your data outside of the European Economic Area ("EEA") without your permission. If a separate supplier is required to provide your service or process your data, they are defined as a Sub-processor, see section 8.

Outside of the above requirements (and section 8, Sub-processors) for your services, we will not transfer any data to any 3<sup>rd</sup> party without permission.

## 5. Compliance with law

We comply with obligations under law directly applicable to the Processing of Personal Data.

## 6. Data Protection Officer

We have a dedicated Data Protection Officer (DPO) who is responsible for ensuring lawful management of Personal Data and all related issues. They can be contacted by telephone on our main office number, by email [dpo@ridgeonnet.com](mailto:dpo@ridgeonnet.com) or by post to our head office addressed to 'Data Protection Officer'.

## 7. Consent

We will collect your consent for processing any Personal Data other than for the provision and support of your services with us. You have the right to opt-out of additional processing at any time by contacting us directly with your request. For your convenience a direct email address is available [privacy@ridgeonnet.com](mailto:privacy@ridgeonnet.com).

For any services under your control, you must obtain and record consent from data subjects and comply with your obligations directly to data subjects.

## 8. Sub-processors

Where required, you permit us to appoint processors or sub-processors from our trusted suppliers to meet the requirements of your data processing requests. If your service or support requires such appointment we will conduct due diligence to ensure the sub-processor meets our security standards for the processing they are performing.

## 9. Personal data breach

In the event of a Personal Data Breach we will take prompt action to implement appropriate corrective action to address the issue causing the breach and prevent further similar breaches. We will notify the client/controller within 24 hours of such breach and provide details of the expected size of breach and those affected as soon as possible.

## 10. Retention

We will not retain Personal Data for longer than necessary to service and support your account or request. We may retain contact details and conversations to be able to service you in the future. If you wish all contact data to also be removed, you should contact the Data Protection Officer to request the 'Right to be forgotten'.

Any data stored by, behalf of or in control of the client should be deleted by the client on terminating the service. If this is not practically possible, the client can request for us to delete the data for them. For data hosted within services you have within us or services under your control, please also see the 'Unknown data' section below.

## 11. Rights of data subjects & audits

Where we are the direct and first processor of personal information (such as dealing with our client's or the public directly as the Data Subjects), we will comply with the rights of Data Subjects directly.

For personal data/services under your control, as the main/first data controller and processor of data hosted with us, you as the client should always attempt to service the Data Subject's requirements directly with the tools provided. If this is not possible, they should contact the Data Protection Officer who will be able to provide assistance where reasonable and practical. You are also responsible for the consent of data subjects, see 'Consent' above. As most data hosted with us is 'Unknown Data' we are not able to service your Data Subjects directly.

We will comply where reasonably possible and appropriate with data audits requested by the client/Data Controller to comply with our legal obligations.

## 12. Unknown data

Due to the nature of our data storage and hosting services, we are often unaware of the data hosted with us by our clients and may be unable to locate or access it (either in part or entirely) – we are often only the storage and/or transfer mechanism. You agree to understand and comply with your obligations under the GDPR and other applicable legislation, as in these cases it is often not practically possible for us to do so on your behalf.

If you believe any of the data are you or we are processing requires special considerations you must notify us before such data is processed.

### 13. **Special category data / Special personal data**

If you are processing Special Category Data (as defined in the GDPR) using our services, where required you must complete a Privacy Impact Assessment and inform us of any implications or changes required to our service offerings to you. In most cases, such Special Category Data will be 'Unknown Data' to us, please refer to the section above.

### 14. **Criminal offence data**

Our services may not be used for processing Criminal offence data unless authorised by our Data Protection Officer.

### 15. **Processing for security**

We reserve the right to process data for the purposes of security and protection of our network and services. This includes but is not limited to, detecting and blocking suspicious activity and virus scanning.

### 16. **Client/user contact details**

It is the client's/user's responsibility to keep us up to date with the most recent administrative and billing contacts who are authorised to operate the account and authorise changes.

### 17. **Website Privacy & Cookie Policy**

Like almost all websites on the Internet, our company websites use cookies. Cookies are a small text file placed on your computer or device that are used to improve your experience on our websites.

We use cookies on our company website for..

- Allowing you to pass data between pages fluidly (e.g. an order process)
- Analysing visitor statistics, e.g. number of visitors, search terms used, referral website and type of computer so that we can improve our websites to perform better for our clients and business.
- A service called "Hotjar" in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymised user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

You can disable or reject Cookies in your web browser if you do not wish to use this functionality.

We do NOT use cookies to collect sensitive data to pass to third parties without your consent.

Using our website constitutes acceptance of this policy.

### 18. **Records of Processing and Communication Records**

We will retain records such as communications as a record of our data processing activities. You permit us to retain these to meet our regulatory obligations.

By communicating with us, you permit us to retain communication information such as emails, phone records, phone recordings and any other communication methods for the purpose of serving you and meeting your requirements (both now and in the future) as well as for training and quality/security monitoring.

#### **19. Policy changes and changes in applicable laws**

We will update this policy from time to time and the latest version will be available on our website or by contacting the Data Protection Officer.