

**GDPR PRIVACY POLICY  
FOR RB PLANT GROUP LIMITED CLIENTS AND VENDORS  
REVISED: JULY 2018**

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**1. PURPOSE AND SCOPE**

RB Plant Group Limited (**RBPG**) understands and values the importance of individual privacy; and we are committed to protecting the privacy and security of our Clients and Vendors personal information as required under the General Protection Regulation (**GDPR**).

This GDPR Privacy Policy applies if you are a past, present or future Client or Vendor of RBPG, or if you have provided RBPG with your Personal Data for any reason. This policy only applies to your Personal Data if you are located in, or live within, the EU when such processing takes place.

For the purpose of the GDPR, RBPG is the “data controller”. This means that we are responsible for deciding how we hold and use personal data about our clients and vendors. We are required under the GDPR to notify you of the information contained in this privacy policy.

The purpose of this policy is to inform you how we collect, use, disclose, transfer and process your personal data, in accordance with the GDPR. As part of this policy, RBPG will comply in all material respects with the GDPR, unless limited to the extent expressly permitted by applicable law, rule or regulation within member states of the EU.

**2. DEFINED TERMS**

Capitalised terms in this policy have the following meanings:-

**Clients and Vendors** – any and all prospective, current, and former clients, suppliers, and vendors.

**Data Subject** – an identified or identifiable natural living individual, including but not limited to individuals who are an employee, agent, or representative of a client or vendor.

**Identifiable Person** – is someone who can directly, or indirectly, be identified by reference to an identifier. Such as a name, an identification number, location data or to one or more factors specific to their physiological, genetic, mental, economic, cultural or social identity.

**EU** – mean European Union  
**GDPR** – the EU General Data Protection Regulation 2016/679  
**ICO** – Information Commissioner’s Office. The UK supervisory authority for data protection issues



**Personal Data** - any information relating to an identified or identifiable data subject. This includes but is not limited to: an individual's name, country of birth, marital status, emergency contact, salary information, terms of employment, job qualifications, address, phone number, email address, user ID, password, and identification numbers, special categories of personal data. It does not include data from which an individual cannot be identified.

**Special Categories of Personal Data** – includes personal data that reveals a data subject's:

- racial or ethnic origin
- political opinions
- religious beliefs
- trade union membership
- genetic data
- biometric data
- health
- sexual orientation.

**Third Party** – any individual or entity that is neither RBPG, nor connected to RBPG in anyway.

### 3. COLLECTION AND USE OF PERSONAL DATA

RBPG may collect personal data directly from clients and vendors, or through other means, such as websites or industry publications.

#### A) How and why we collect personal data

In the course of business we collect data from its clients and vendors, which may contain personal data of the data subjects, such as:

- **Enquiry related information** – sometimes prospective clients, existing clients, vendors contact us with questions or enquiries regarding products and services. In order to respond to these enquiries, we will collect data such as contact information, business related information and any other information necessary to give a response.
- **Purchase related information** – in order to process orders and payments, we will collect purchase related information, such as billing address and bank account information.
- **Contact information** – in order to communicate with our Clients and Vendors, or for reasons related to our business relationship with them, we may collect relevant contact information such as business name, type of business/industry, contact person's details, telephone numbers, business address and email address.

- **Other Information** – in the course of conducting our business operations or in the promotion of our legitimate business interests we may on occasion incidentally collect information relating to personal data.

## B) How We Use Personal Data and Special Categories of Personal Data

RBPG uses personal data for the purpose of conducting business, including but without limitation:

- (1) to process orders and payments
- (2) to receive and deliver products or services
- (3) to communicate with clients and vendors
- (4) to assess and improve the quality of our services and business operations
- (5) to satisfy governmental reporting and tax requirements
- (6) to satisfy security, health and safety concerns
- (7) for employment related and business-related purposes
- (8) as permitted or required under applicable local laws and regulations.

RBPG will only use personal data for the purposes for which it was collected, unless we consider it reasonable to use it for another reason and that is compatible with the original purpose.

RBPG may process personal data without a data subject's knowledge or consent where there is a legal obligation or right to do so.

RBPG may use special categories of personal data with the consent of the affected data subject only, for:-

- (1) the purpose for which it was originally provided
- (2) any other purpose as long as the affected data subject has consented to such use, or
- (3) any of the following other uses, regardless of the purpose for which it was originally provided, without the requirement of additional consent for such use:
  - (a) is necessary for the establishment and/or exercise of legal claims or defences, or for the purposes of establishing, exercising or defending RBPG's legal rights
  - (b) is necessary to protect the vital interest of the data subject or of another natural person, where the data subject is physically or legally incapable of giving consent

- (c) is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices
- (d) is necessary to carry out RBPG's obligations under applicable laws
- (e) the personal data is manifestly made public by the customer or vendor or data subject, or
- (f) as otherwise required by law.

#### **4. DISCLOSURES/ONWARD TRANSFERS**

Except as stated herein, RBPG will only disclose personal data of our clients and vendors or data subjects only with third parties and/or RBPG affiliates where required by law, where it is necessary to administer the relationship with our clients and vendors or data subjects, or where we have another legitimate interest in doing so.

RBPG may provide the personal data of our clients and vendors or data subjects to third parties who are acting as agents to perform tasks on behalf of, under the instructions of RBPG for specified purposes. All RBPG's third parties are required to take appropriate security measures to protect the personal data of its clients and vendors or data subjects. RBPG will endeavour to dissuade third parties from using such personal data for their own purposes.

RBPG may transfer the personal data of its clients and vendors or data subjects to RBPG affiliates and/or third parties based outside the EU.

The personal data of its customer and vendors or data subjects may be stored and processed in any country where RBPG and any RBPG affiliates have their operations. RBPG is based in the United Kingdom and the personal data of its customer and vendors or data subjects will be transferred to and processed in the United Kingdom. RBPG as a data controller will process such personal data in the United Kingdom in compliance with EU data protection legislation.

RBPG may allow exceptions to this policy thereby permitting personal data to be disclosed when a client or vendor or effected data subject has consented to the disclosure in accordance with the applicable requirements under the GDPR, or as otherwise permitted under the GDPR.

## **5. CONFIDENTIALITY AND SECURITY OF PERSONAL DATA**

RBPG maintains appropriate physical, administrative and technical safeguards designed to secure personal data. RBPG has put appropriate security measures in place to prevent against negligent or accidental loss or destruction, improper use, alteration or unauthorised access to such data. Access to RBPG's electronic information systems requires user authentication via password or similar means. Further, all physical media are physically secured.

In addition, RBPG limits access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process such data on RBPG's instructions and they are subject to a duty of confidentiality,

Despite these precautions, no data security safeguards are fool proof. Identity thieves, hackers and other unauthorised individuals may find ways to obtain personal data. Although this is unlikely, RBPG has put in place procedures to deal with any suspected and/or actual data security breach and will notify the affected data subjects and the ICO of a suspected breach or actual breach where we are legally required to do so and take steps to mitigate harm.

## **6. DATA SUBJECT RIGHTS**

Under certain circumstances data subjects have the right, under law, to:-

- Requests access to their personal data. This entitles them to receive details of the personal data that we hold and to check that we are processing it lawfully.
- Request corrections to any of the personal data that we hold about them. This enables the data subject to ensure that any incomplete or inaccurate information we hold is corrected.
- Request to erase personal data held. This enables data subjects to ask RBPG to delete or remove such data where there is no good reason for us continuing to process it. They also have the right to ask RBPG to delete or remove personal data where they have exercised the right to object to processing (see below).
- Objection to processing of personal data, where RBPG is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes them want to object to processing on this ground. Data subjects also have the right to object where RBPG is processing their personal data for direct marketing purposes.

- Request the restriction of processing of personal data. This enables data subjects to ask RBPG to suspend the processing of personal information, for example, if they want us to establish its accuracy or the reason for processing it.
- Request the transfer of their personal data to another party.

RBPG will grant such requests, except where otherwise permitted to refuse to comply with a request under the GDPR. If you are a customer of vendor of a data subject and wish to exercise any of the above rights in relation to your personal data held by RBPG, please send your request via mail or email to:-

RB Plant Group Ltd  
RB House, The Square  
Lenham  
Maidstone  
Kent ME17 2PG

Email: [mail@rb-plant.co.uk](mailto:mail@rb-plant.co.uk)

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, should your request for access is clearly unfounded or excessive, then RBPG may charge an administration fee. Alternatively, in such circumstances we may refuse to comply with the request.

RBPG may need to request specific information from clients and vendors and/or data subjects to help us confirm the identity of the relevant data subject(s) and ensure their right to access the information under the GDPR, or to exercise any of your other rights. This is another appropriate security measure to ensure personal data is not disclosed to any person who has no right to receive it.

In the limited circumstances where, as a data subject, you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from RBPG), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the following details:-

RB Plant Group Ltd  
RB House, The Square  
Lenham  
Maidstone  
Kent ME17 2PG

Email: [unsubscribe@rb-plant.co.uk](mailto:unsubscribe@rb-plant.co.uk)

Once RBPG has received notification that a data subject has withdrawn their consent, RBPG will no longer process such information for the purpose or purposes that the data subject originally agreed to, unless RBPG has another legitimate legal basis for doing so.

## **7. DATA INTEGRITY**

It is important that the personal data which RBPG holds about the data subjects is accurate and current. Clients and vendors and data subjects should keep RBPG informed of any changes which we need to be made aware of.

RBPG will not maintain personal data any longer than necessary for the purposes for which it was collected, or other legal requirement, whichever is longer, unless otherwise agreed to between RBPG and the client or vendor or data subject (as applicable) in writing. To determine the appropriate retention period for the personal data, RBPG will consider the amount, the nature and the sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which RBPG and/or any RBPG affiliates process the personal data, and whether RBPG can achieve those purposes through other means, and the applicable legal requirements.

## **8. CHANGES TO THIS POLICY**

This policy may be amended from time to time without requiring further customer or vendor and data subject consent, provided such amendments are consistent with applicable data protection and privacy laws and principles. Changes to the policy will be posted on RBPG's website, found at [www.rbplant.com](http://www.rbplant.com). Please check the RBPG website regularly for any changes to this policy. If you are an RBPG client or vendor, we will also notify you if we make changes that materially affect the way we handle personal data previously collected from you or as otherwise required under the GDPR.

## **9. QUESTIONS OR COMPLAINTS**

Clients and vendors and data subjects may contact us with questions about this policy at the following address:-

RB Plant Group Ltd  
RB House, The Square  
Lenham  
Kent ME17 2PG

Email: [mail@rb-plant.co.uk](mailto:mail@rb-plant.co.uk)

*If you have any questions, complaints or disputes regarding the manner in which RBPG handles or protects your personal data, please contact us using the contact information above. RBPG will promptly investigate and attempt to resolve complaints and disputes in accordance with the principles contained in this policy.*



With respect to any complaints regarding this policy that cannot be resolved through RBPG's internal processes, RBPG has agreed to participate in the dispute resolution procedures as stipulated by the Information Commissioners Office (ICO). In the event that we or the ICO conclude that we did not comply with this policy, RBPG will take appropriate steps to remedy any adverse effects and assure future compliance.

Data subjects and clients and vendors also have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues.

## **10. POLICY REVIEW**

As part of RBPG's compliance with the GDPR, RBPG will periodically review and revise this policy for accuracy, as well as for conformity with the applicable data privacy and protection laws.