RAIDIAM

Privacy Policy

Effective date/last updated August 2024

1.0 Overview

The privacy and security of your data is of paramount importance to all of us at Raidiam. Whether you visit our website, speak to one of our team or use our services more widely, you are trusting us with your information. This policy sets out how we collect, use and respect such information, and how the law protects you and your information.

Please read this Privacy Policy carefully before using our website, our products or any of our services.

2.0 How to contact us

Raidiam Services Limited ("**Raidiam**") (company number 10742851) is based at New Broad Street House, 35 New Broad Street, London, EC2M 1NH, United Kingdom. In this Privacy Policy, Raidiam will be referred to as "**we**", "**us**", or "**our**". Additionally, there are references to "**You**" and "**Your**". In these instances, "You" may be a visitor to our website, a customer that is an individual or an employee of a corporate customer (in each case, a "**Customer**"), or a user of our Customer's products or services ("**End User**"). Raidiam is registered as a data controller with the Information Commissioner's Office ("**ICO**") under number Registration number: ZA472236.

If you have any questions or queries about the contents, please email us ε ›@raidiam.com

3.0 Why this policy exists

This privacy policy explains how we collect, store and process your information which you provide to us to interact with our websites and the services provided (together, the "**services**"), when you attend events and visit our offices and when other sources provide it to us, as further described below. Please read it together with any other data protection documents we may have sent you. This policy supplements other such documents and is not intended to override them. All references to "**information**" in this policy, means any data which identifies a natural person, or which allows that person to be identified when combined with other data.

This privacy policy is provided in accordance with our obligations under applicable privacy and data protection law, including the UK retained version of Regulation (EU) 2016/679 ("**GDPR**") and the Data Protection Act 2018.

We keep our privacy policy under regular review. The version of the policy became effective on the date shown above.

4.0 What information we have & how it was collected

We collect and use information to operate our website and to deliver our services, as well as to provide useful updates and other information about our services. In this context, we are a **data controller**.

Please note that this Privacy Policy does not apply to the extent that we process information in the role of a **processor** on behalf of our customers (such data "**end user data**"), including where we offer to our customers, through our hosted platform, various products and services, through which our customers connect their own applications and websites and end users. In this context, each of our customers, not Raidiam, controls whether they provide you with access to our platform and services and, if they provide you with access, they control what information about you that they submit to our service. For detailed privacy information applicable to situations where a Raidiam customer who uses our platform and services is the controller, or should you wish to exercise any rights y may have under applicable data protection laws with respect to that End User D please reach out to the respective customer directly. We are not responsible

for the privacy or data security practices of our customers, which may differ from those set forth in this Privacy Policy.

4.1.1 What information we collect

We have set out below the information we may collect, use, store and transfer:

- **Contact data** including billing address, delivery address, email address and telephone numbers.
- **Identity data** including your name, username, national identification (such as passport numbers), date of birth, log in data you supply to us as you register.
- **Financial data** including bank account, sort code, IBAN, pay IDs, billing address and credit rating.
- **Transaction data** including details about payments made and other details of services and content supplied.
- **Technical data** including information we collect as part of our cookie settings about use of a website, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technical characteristics of your device, your use of our services and applications and connection to our website.
- **Usage Data** information about your visit, including the website that referred you to our website (if applicable), the path that you take through and from our website (including date and time); pages that you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- **Marketing and communications data** including preferences in receiving marketing from us and third parties and communication preferences and any other information you supply to us (such as feedback).
- **Employment data** includes current and past employment, experience, qualifications, skills, interests, right to work, and proof of address and any other information disclosed by you during the application process, which may include **special categories of personal data** (such as race, ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about health, and information about criminal convictions and offences).

4.1.2 How we collect your information

We use different methods to collect data including through:

- **Information you provide to us directly.** You may give us details such as a name, email address and other contact details in person, or by filling in forms on our website or by corresponding with us by post, phone, email, social media and/or otherwise. This includes information provided when you:
    - contact us via our website;
    - participate in, download, access, use, or sign up to receive or otherwise request our services;
    - participate in an event which we have attended or organised;
    - meet with, contact or engage with our staff;
    - subscribe to our publications or newsletters, or request any other information to be sent to you;
    - contact us about a role with us;
    - provide us with your marketing preferences, respond to a survey, make a complaint or give us some feedback
- **Automated technologies or interactions.**When you interact with our website, we may automatically collect technical data about your equipment, IP address, browsing actions and patterns. We collect this data by using cookies and other similar technologies. We may also receive technical data if you visit other websites employing our cookies.
- **Third parties and publicly available sources.** We may also receive personal data from various third parties as set out below:
    - identity and contact data from other individuals at your organisation;
    - information given to us by our clients and businesses that we work with;
    - technical data from analytics providers and/or search information providers; and
    - employment, identity and contact data from recruitment agencies, previous employers, etc.

4.2 Why we collect and use your information

We will only collect and use information when the law allows us to. Most c ıonly, we will use your information so we can provide and maintain our

services, to analyse and improve our services, to keep our services secure and protect against fraud, abuse and intrusion, for marketing and if required by law.

The table below set out the ways we use information and our legal basis for doing so. Most commonly, we will use your information:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is in our legitimate interest to do so (or those of a third party) and it is proportionate to do so;
- where we need to comply with a legal obligation.
- Generally, we do not rely on consent as a legal basis for processing information but exceptionally rely on consent to send marketing communications to you via telephone and/or email. You have the right to withdraw your consent at any time by responding to the person that contacts you or selecting the unsubscribe option in an email from us.

Product/Service	Purpose/Activity	Type of data	Lawful basis for processing (including basis of legitimate interest)
If you are a customer or prospective customer of Raidiam's services:	(a) To register you as a new or prospective customer; (b) To provide inquirers with support via email or by telephone, including recording conversations for monitoring, training and quality purposes.	(a) Identity (b) Contact	(a) Performance of a contract with you, including taking action before entering into a contract. (b) Necessary for our legitimate interest (for running our business and to provide our services)

To deliver services and content to you including: (a) Contacting you and taking instructions (b) Managing payments, fees and charges (this may include exchanging information with other companies and organisations for fraud protection and credit risk reduction). (c) Collecting and recovering money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover any debt due to us)
To manage our relationship with you, including: (a) Responding to your inquiries or fulfil your requests (e.g., send you documents or information you	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

request, give you access to information we hold on you). (b) Notifying you about changes to our terms of business or privacy policy. (c) To provide customers with support via email or by telephone, including recording conversations for monitoring, training and quality purposes. (d) To process and respond to complaints.		
To administer and protect our services, customers and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical(d) Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and incident prevention)

		(b) Necessary to comply with a legal obligation
(a) To remarket, target, and retarget content to you about our products and services. (b) Asking you for a testimonial or feedback or to take a survey	(a) Identity (b) Contact (c) Technical(d) Usage	Necessary for our legitimate interests (to study how clients use our services and content, to develop them and grow our business).
To use data analytics to improve our website, services, marketing and customer relationships and experiences	(a) Technical	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To send our marketing communications about content, product and service offerings, newsletters, webinars, seminars, and event invitations which	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our services and content and grow our business)

	are relevant to your interests and in line with your preferences.		(b) where required by law, to seek explicit consent prior to sending individuals the information and to manage individual preferences.
If you are a customer of Raidiam's services which uses certain applications which rely on a Third-Party Service to support its functionality and/or enhance its security.	If you choose applications which interoperates with a Third-Party Service, we may share some information about you with the Third-Party Service to facilitate the integration.	(a) Usage (b) Technical	(a) Performance of a contract with you (b) Necessary for our legitimate interest (for running our business and to provide our services)
If you are a prospective employee, contractor or service provider to Raidiam	(a) To process a job application and keep you informed of employment opportunities. (b) To conduct human resource administration to include assessing suitability,	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you, including taking action before entering into a contract. (b) Necessary to comply with a legal obligation

	eligibility and/or fitness to work.	(c) Necessary for our legitimate interests (to recruit good candidates for our business)
If you are a visitor to our website	We may collect information about you through cookies or similar tracking technologies that we have set on our website; and/or when you provide us with your marketing preferences through the website. For more information see our “Cookies Policy”.	

Where we need to collect information by law, or under the terms of a contract and you do not provide that information when requested, we may not be able to perform the contract or provide you with our services.

5.0 Use of cookies

Like many other websites, our website, our services and the third-party service providers use cookies and similar technologies. Cookies play an important role in helping us provide personal, effective and safe services. We change the cookies p lically as we improve or add to our website and services and/or the third-

party services, but we generally use cookies to operate our services. Some cookies are essential to the operation of our website and services. (See Cookie Policy).

6.0 Information relating to children

This website and our services are not intended for children, and we do not knowingly collect information on children. If you believe that we have received information on someone under the age of 18, please contact us at dpo@raidiam.com.

7.0 Change of purpose

We will only use your information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, contact us at dpo@raidiam.com.

If we need to use your information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8.0 Who we share your information with & why

We may share your information with others, particularly those that help us provide our services or run our business effectively. Most commonly, this includes our staff, our IT service providers, those who manage our data, and our advisers and marketing partners. We also use third-party services data processors (“**third party services**”) to provide elements of services for us.

We require others to respect the information we share with them, and to only use it in ways the law allows. We only allow others to use such information for the specific purposes we set out, and not for any other purposes. When we engage processors to process information on our behalf, we ensure a contract is in place

with the processor that sets out the details of the processing and restricts their access to and use of personal information.

We may have to share information with third parties (including those below) for the purposes and activities explained above:

- Our staff and who provide services or are involved in the running of our business.
- Service providers who perform services and functions on our behalf in connection with the operation of our business such as software and application service providers and third parties who host, store and manage data or provide programming or technical support, conduct reference and criminal records checks on candidates on our behalf, etc.
- Third-party service providers if a customer registers for a Raidiam's service which uses certain applications which rely on a Third-Party Services to support its functionality, or help to enhance its security, that Raidiam grants you access to, and use of, for the purposes of the particular application. A list of third-party service providers and sub-processors can be found at the Raidiam Trust Centre
- Professional advisers including our accountants, insurers and brokers and auditors who provide auditing, banking, legal, insurance and consultancy services, etc.
- Marketing service providers to help us to communicate with you.
- Third parties if we are required to do so by law, or if we believe that such action is necessary to: (a) fulfil a government, or regulatory authority request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our websites or customers.
- Those to whom we may sell, transfer, or merge parts of our business with, or where we acquire other businesses or merge with them. If such a change happens then any new owners may use your personal data in the same way as set out in this policy.

We will share information, without notice, only if we are required to do so by law or we, in the good faith, believe that such action is necessary to:

- comply with legislation or any legal process served on us;
- protect and defend our rights and/or property; and
  - protect personal safety.

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.

We do not sell or give your information to third parties for them to contact or market their goods or services to you without your consent.

9.0 International transfers

The information that we collect from you will, generally speaking, not be transferred to, nor stored outside the European Economic Area ("**EEA**") or the UK. We will take reasonable steps to ensure that your information is handled securely and in accordance with this policy.

Our third-party service providers and partners operate around the world. If any third party to which we send information may be based outside the UK, then their use of your information will involve a transfer of data outside the UK. Whenever we transfer personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer information to countries that have been deemed to provide an adequate level of protection for personal data by the Information Commissioner's Office. For further details, see the Information Commissioner's Office website.
- Where we use certain service providers, we may use specific contracts approved by the Information Commissioner's Office with the service provider which give the information the same protection it has in the UK. For further details, see the Information Commissioner's Office website for the transfer of personal data to third countries.

Please contact us if you want further information on how we ensure adequate protection for any Personal Data transferred out of the EEA or the UK at dpo@raidiam.com.

10.0 Analytics providers

Our service providers, such as Google Analytics (Google Inc. and its affiliates), may p ss your data in the course of providing analytical information to us about the

use of our website. These service providers may collect and/or transfer your data outside of the UK or European Economic Area. See Google Analytics: Safeguarding your data.

11.0 Third-party links and services

Our website may include links to third-party websites and/or plug-ins and may contain links for sharing on social and professional media (such as LinkedIn, Facebook, Instagram, Twitter and Youtube) and/or for registration, authentication processes and e-signature (such as Docusign). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites or services and are not responsible for their privacy practices or privacy statements. When you leave our website, we encourage you to read the privacy policy of any new website you visit if this a concern for you.

For the avoidance of doubt, We are not responsible for the security of your information when you access any third-party site.

12.0 How we protect your information

We take steps to keep your information secure and we delete it when we no longer need it.

12.1 Security of your personal data

We have put in place appropriate security measures to prevent information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to information to those of our staff and other third parties who have a business need to know. They will only process information 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.

You can find out more about our security and compliance from the Raidiam Trust Center.

12.2 Data retention

We will retain information 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 information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of the information, the purposes for which we process the information and whether we can achieve those purposes through other means, and the applicable legal requirements.

For example, if you are a customer, we will generally keep your information for the longer of: (a) six years from the date of our last interaction with you; or (b) until the relevant statutory limitations period has expired.

We regularly review the information we hold, taking into account the lawful purpose for which we hold it, and any data that is deemed no-longer relevant or required is deleted where it is practicable to do so.

13.0 Your rights

Privacy laws give you certain rights. For example, you can choose whether to receive marketing from us and you can ask us what information we have about you.

13.1 Opt out rights

You may, at any time opt-out of receiving marketing communications from us by contacting us or selecting the unsubscribe option in an email from us.

If you need to contact us regarding marketing communications, please email hello@raidiam.com.

13.2 Rights of access

You have the right to:

- **Request access.** This means you can ask us to give you a copy of the information we hold about you.

- **Request correction**. This means if we have incomplete or inaccurate information, you can ask us to correct it. It is important that the information we hold about you is accurate and current. Please keep us informed if the information you provide us changes as our relationship evolves. Note, we may need to verify the accuracy of the new data you provide to us.
- **Request erasure**. This means you can ask us to delete or remove any information we have if there is no good reason for us continuing to have it. You also have the right to ask us to delete or remove information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your information to comply with local law. 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.
- **Object to processing**. This means you can contact us if you feel our use of your information impacts on your rights and freedoms. This applies if we are: (a) relying on our legitimate interest (or those of a third party) to use your information; (b) if we are using your information for direct marketing purposes; (c) if you believe we are using your information unlawfully; or (d) where we need to erase you information to comply with local laws. It is unlikely, but in some cases we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction**. This means you can ask us to suspend using your information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer**. This means you can ask us to transfer the information we hold on you to you, or to a third party.We will provide to you, or the third party you have chosen, your information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.
- **Withdraw consent**. This means you can tell us that you no longer consent to our use of your information at any time where we are relying on consent to

process your information. If you withdraw your consent, we may not be able to provide certain services or content to you. We will advise you if this is the case at the time you withdraw your consent. Note that this will only apply to any information where we were previously relying on consent as the legal basis to use your information. This action will also not affect the lawfulness of any processing carried out before you withdraw your consent.

If you need to contact us regarding exercising your access rights
contact dpo@raidiam.com

13.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and your rights in relation to your request. This is a security measure to ensure that information is not disclosed to any person who does not have a 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.

13.4 No fee usually required

You will not have to pay a fee to exercise the rights listed above. However, we may charge a reasonable fee if your request is unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

13.5 Time limit to respond

We try to respond to all legitimate requests as soon as reasonably practicable and at least within one month. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13.6 Right to complain to the Information Commissioner's Office

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 is s (http://www.ico.org.uk). We would, however, appreciate the chance to deal

with your concerns before you approach the ICO so please contact us in the first instance at dpo@raidiam.com.

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