

Rossnet Privacy Notice

Version **1.0**. Last Updated by **Dr Joseph Ross** on **30/12/2025**. Next Review due by **30/12/2026**.

This is the privacy notice of Rossnet Consultancy Limited ("the Business").

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you engage with us. We'll also tell you about your privacy rights and how data protection law protects you. This privacy notice aims to give you information on how we collect and process your personal data.

Our service is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice 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.

Rossnet Consultancy Limited, a limited company registered in England and Wales (CRN: 12866659), is the controller and is responsible for your personal data (collectively referred to as "Business", "we", "us" or "our" in this privacy notice). Our registered address is 3 Palatine Close, Torquay, TQ1 1RD. For all data matters contact dpo@rossnet.uk. We are registered with the Information Commissioner's Office (ICO) under registration number ZA922673.

Our content may include links to third-party content, plug-ins and applications. 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 content and are not responsible for their privacy policies or notices.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

In this policy, we explain:

- ⦿ The personal data we collect about you
- ⦿ How we collect your personal data
- ⦿ How we use your personal data
- ⦿ How we share your personal data with
- ⦿ International transfers
- ⦿ Data security
- ⦿ Data retention
- ⦿ Your legal rights
- ⦿ Your duty to inform us of changes
- ⦿ Queries, requests or concerns



1. The personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioner's Office.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- ⦿ Identity Data: title; first name; last name; nationality; National Insurance number; copies of identity documents.
- ⦿ Contact Data: address; email address; telephone number(s); social media and communications platform aliases; company or organisation; role.
- ⦿ Technical Data: Internet Protocol (IP) address; browser type and version; time zone setting and location; browser plug-in types and versions; operating system and platform; and the device used to access this site.
- ⦿ Usage Data: information about how you use our website.
- ⦿ Marketing and Communications Data: your preferences in receiving marketing from us and our third-party partners; topics of interest; your opinions regarding our services; communications between us; your communication preferences (you may receive marketing communications from us if you have requested information from us or have negotiated for or contracted to receive our services and you have not opted out of receiving that marketing under the 'soft opt in' within the UK's Privacy and Electronic Communications Regulations (PECR)).
- ⦿ Contractual and Transactional Data: agreements between us or which you enter into on behalf of an organisation; services you request and/or we provide to you.
- ⦿ Financial and Payment Data: bank account; billing and payment information (processed via our banking and payment service providers). We do not store card security codes.
- ⦿ Screening Data: identification and contact information concerning registered officers, and individuals with significant control; information regarding criminal and regulatory investigations, findings and convictions of individuals with significant control, registered officers and staff; the expertise, professional qualifications and certifications of registered officers and staff; public domain information regarding individuals with significant control, registered officers and staff.
- ⦿ Education and Work Data: academic institutions; employers; qualifications; experience; references.
- ⦿ Other Data Necessary for the Provision of our Services.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not routinely collect special category personal data. Where criminal conviction data is processed, it is done only where lawful, proportionate, and necessary for compliance with legal or contractual obligations.

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. How we collect your personal data

We may obtain your personal data:

- ⊗ directly from you;
- ⊗ from individuals or entities acting on your behalf;
- ⊗ from our clients;
- ⊗ from your organisation;
- ⊗ when you or your organisation browse, complete a form or make an enquiry or otherwise interact with us via our website, social media or other platforms;
- ⊗ from search engine and web analytics providers;
- ⊗ by referrals;
- ⊗ from our professional advisers, including, without limitation, our insurers, legal advisers and accountants;
- ⊗ from courts, law enforcement bodies, regulators, government departments or agencies, lawyers or other parties; and/or
- ⊗ from the public domain.

3. How 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:

- ⊗ **Performance of Contract:** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- ⊗ **Legitimate Interest:** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the 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:** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us dpo@rossnet.uk.

We will only use your personal data 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, please contact our Data Protection Officer at dpo@rossnet.uk.

If we need to use your personal data 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 personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Who we share your personal data with

We may share your personal data with:

- ⊗ internal third parties: Rossnet Research Centre Limited and any subsidiaries of Rossnet Consultancy Limited
- ⊗ our clients;
- ⊗ our professional advisers, including, without limitation, our insurers, legal advisers, accountants, etc;
- ⊗ our suppliers, business partners and sub-contractors;
- ⊗ with courts, the police, law enforcement bodies, regulators, government departments or agencies, lawyers or other parties;
- ⊗ companies providing anti-money laundering and terrorist financing services, credit reference and other fraud and crime prevention companies, financial institutions, and related regulatory bodies; and
- ⊗ third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets, and their advisors. Alternatively, we may seek to acquire other businesses or merge with them. If a change occurs in our business, the new owners may use your personal data in the same manner as outlined in this privacy notice.
- ⊗ other third parties to which you request that we disclose your data.
- ⊗ 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.

5. International transfers

When we process your personal data, we may process it in countries outside of the UK and the European Economic Area ('the EEA', which is comprised of the EU in addition to Iceland, Norway and Liechtenstein), for example, when we engage third-party service providers based in other countries. When we conduct relevant international transfers of your personal data, we will only do so in circumstances where:

- ⊗ You provide your explicit consent;

- ⦿ It is necessary to conclude or perform a contract in your interest between us and an individual or entity;
- ⦿ It is necessary for the establishment, exercise or defence of legal claims;
- ⦿ The European Commission has determined that the country to which the data is to be transferred ensures an adequate level of protection (e.g. Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland, and Uruguay); and/or
- ⦿ We have entered into appropriate safeguards recognised under UK data protection law (for example, the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses), and where necessary have conducted a transfer risk assessment.

Should you require further information, please contact us using the details below

6. 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.

7. Data retention

We will retain your personal data for as long as necessary to fulfil the purpose(s) for which it was collected. This will typically mean that we will retain your personal data for as long as you/your organisation is a customer of ours or maintains an association with us and/or for as long as you are content to receive communications from us, and for a period thereafter as necessary to comply with legal, accounting, taxation or regulatory requirements, to prevent fraud, or as required in the context of establishing, exercising or defending legal rights or responding to your communications.

We may also retain your personal data outside of these periods, where technical reasons prevent us from deleting it. In such cases, we will isolate and securely store it until secure destruction/erasure is possible.

Otherwise, we will securely destroy/erase your personal data, or shall anonymise it.

In practice, we will retain your personal data for a short period (up to 180 days) beyond the specified retention period, allowing for review and any necessary deletion to take place.

8. Your legal rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- ⦿ Right to be informed – Data Subjects have the right to know why we are collecting and processing personal data, this right is met by the provision of this Privacy Notice and any subsequent privacy documentation;
- ⦿ Right of access – you have the right to know what personal data we have on record and request a copy;
- ⦿ Right of rectification – you have the right to correct personal data that we hold about you that is inaccurate or incomplete;
- ⦿ Right to be forgotten – in certain circumstances you can ask for the personal data we hold about you to be erased from our records;
- ⦿ Right to restriction of processing – where certain conditions apply you have a right to ask us to only process your personal data for certain processing activities;
- ⦿ Right of portability – you have the right to have the personal data we hold about you transferred to another Data Controller;
- ⦿ Right to object – you have the right to object to certain types of data processing such as marketing; and
- ⦿ Right to object to automated processing, including profiling – you also have the right to object to the legal effects of automated processing or profiling.

If you wish to exercise any of the rights set out above, please contact dpo@rossnet.uk.

You can exercise these rights by contacting us using the details below. You will not have to pay a fee to exercise your rights; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Rossnet Consultancy Limited will only handle personal data in ways that individuals would reasonably expect and not use it in ways that have unjustified adverse effects on them. Additionally, if you have a complaint about how we have handled your personal data, you may be able to request that we restrict our use of your personal data while your complaint is being investigated. To exercise these rights, we need to be suitably satisfied of your identity and may therefore request that you provide identification documents or confirm other details we hold about 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). This is a security measure to ensure that personal data is not disclosed to any person who has no 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.

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. In this case, we will notify you and keep you updated.

9. Your duty to inform us of changes

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

10. Queries, requests or concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please, in the first instance, contact our Data Protection Officer at dpo@rossnet.uk or by post to 3 Palatine Close, Torquay, TQ1 1RD.

Rossnet Consultancy Limited hopes we can resolve any query or concern you raise about our use of your personal data.

Should we not be able to resolve the complaint, you have the right to lodge a complaint with the lead authority. The lead authority in the UK is the Information Commissioner's Office (ICO), who may be contacted by telephone on 0303 123 1113 or by visiting www.ico.org.uk.