

# Rinzen Project Privacy Policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information. You can access the privacy controls via [www.rinzenproject.com/privacypolicy](http://www.rinzenproject.com/privacypolicy)
- 1.5 In this policy, "we", "us" and "our" refer to Rinzen Project. For more information about us, see Section 13.

## 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com/free-legal-documents/privacy-policy>).

## 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent or our legitimate interests, namely monitoring and improving our website and services.

- 3.3 We may process your website user account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent or our legitimate interests, namely the proper administration of our website and business or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.4 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent or our legitimate interests, namely the proper administration of our website and business or the performance of a contract between you and us and/or the taking steps, at your request, to enter into such a contract.
- 3.5 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The source of the transaction data is you and/or our payment services provider. The transaction data may be processed for the purpose of supplying the purchased goods and/or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; providing that, if you are not the person contracting with us, the legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.
- 3.6 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent or our legitimate interests, namely communications with our website visitors and service users or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.7 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.8 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.9 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.2 Your personal data held in our website database and will be stored on the servers of our hosting services providers identified at [www.rinzenproject.com](http://www.rinzenproject.com).

4.3 We may disclose *personal data* to our suppliers or subcontractors identified at [www.rinzenproject.com](http://www.rinzenproject.com) insofar as reasonably necessary for the proper administration of our website and business or the performance of a contract between you and us and/or the taking steps, at your request, to enter into such a contract.

4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **5. Third Party Services Providers Outside of the EEU**

**5.1** Some of the third parties service providers we use are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

**5.2** Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

**a)** We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or

**b)** Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or

**c)** If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

**If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.**

## **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 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.
- 6.3 When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.
- 6.4 For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.
- 6.5 In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **7. Your rights**

- 7.1 In this Section 7, we have listed the rights that you have under data protection law.
- 7.2 Your principal rights under data protection law are:
  - (a) the right to access - you can ask for copies of your personal data;
  - (b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
  - (c) the right to erasure - you can ask us to erase your personal data;
  - (d) the right to restrict processing - you can ask us to restrict the processing of your personal data;
  - (e) the right to object to processing - you can object to the processing of your personal data;
  - (f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
  - (g) the right to complain to a supervisory authority - you can complain about our processing of your personal data; and

- (h) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

Email: [info@rinzenproject.com](mailto:info@rinzenproject.com)

Post: Rinzen Project, 6 Aultone Way, Sutton SM1 3LE

## **8. About cookies**

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

## **9. Cookies that we use**

9.1 We use cookies for the following purposes:

- (a) authentication and status - we use cookies to identify you when you visit our website and as you navigate our website, and to determine if you are logged into the website.
- (b) personalisation - we use cookies to store information about your preferences and to personalise the website for you.
- (c) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.
- (d) advertising - we use cookies to help us to display advertisements that will be relevant to you.
- (e) analysis - we use cookies to help us to analyse the use and performance of our website and services.

- (f) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

## **10. Cookies used by our service providers**

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>

## **11. Managing cookies**

- 11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
  - (a) <https://support.google.com/chrome/answer/95647> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
  - (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
  - (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
  - (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
- 11.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 11.3 If you block cookies, you will not be able to use all the features on our website.

## **12. Amendments**

- 12.1 We may update this policy from time to time by publishing a new version on our website.
- 12.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 12.3 We may notify you of significant changes to this policy by email.

### **13. Our details**

13.1 This website is owned and operated by Tami Irokawa McGonigal

13.2 Our principal place of business is at 6 Aultone Way Sutton SM13LE.

13.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, by calling +44 7939 823617; or
- (d) by email, by contacting us at [info@rinzenproject.com](mailto:info@rinzenproject.com).

### **14. Data protection officer**

14.1 Our data protection officer's contact details are: [info@rinzenproject.com](mailto:info@rinzenproject.com).