

RSM UK Foundation privacy policy

Purpose of policy

This policy describes how the RSM UK Foundation ('RSM UK Foundation', 'it') collects and processes the personal data it receives in the course of, and associated with, its activities as a charitable foundation. It acts as a data controller in respect of this personal data.

RSM UK Foundation is independent from the 'RSM Group' (defined as RSM UK Holdings Limited and persons, bodies corporate or partnerships controlled (directly or indirectly) by it). The RSM Group provides RSM UK Foundation with support services, including in relation to the protection of personal data. This policy relates to RSM UK Foundation only and other policies and documents, including the relevant RSM Group Terms and Conditions of Business, will apply to the RSM Group.

RSM UK Foundation may change the terms of this policy from time to time. This version is dated 15 January 2019.

Privacy Contact

RSM UK Foundation has appointed a Privacy Contact to deal with questions relating to this policy who can be contacted at: nick.sladden@rsmuk.com.

The data RSM UK Foundation collects

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

RSM UK Foundation may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data: includes, in relation to you or a family member, first name, maiden name, last name, username or similar identifier; title; date of birth; gender;
- Contact Data: includes home address and billing address (if different), email address and telephone numbers;
- Financial Data: includes income, personal expenditure, charitable donations, taxation and other financial-related details; bank account and payment card details; and
- Transaction Data: includes details about payments to and from you.

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 policy.

We may collect special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may also collect information about criminal convictions and offences.

How is your personal data collected?

You may give RSM UK Foundation your personal data by filling in forms or by corresponding with RSM UK Foundation by post, phone, email or otherwise.

Other data controllers (including, in particular, the RSM Group) may also provide your personal data to RSM UK Foundation.

How RSM UK Foundation uses your personal data

RSM UK Foundation will only use your personal data where the law allows it to, including in the following circumstances:

- To enable RSM UK Foundation to fulfil its charitable objectives, associated activities and related legitimate business interests; and
- To fulfil its legal and regulatory obligations.

Change of purpose

RSM UK Foundation will only use your personal data for the purposes for which RSM UK Foundation collected it, unless RSM UK Foundation reasonably considers that it needs to use it for another reason and that reason is compatible with the original purpose. If you wish to receive an explanation as to how processing for the new purpose is compatible with the original purpose, please contact RSM UK Foundation's Privacy Contact at: nick.sladden@rsmuk.com.

Please note that RSM UK Foundation may process your personal data without your knowledge or consent where this is required or permitted by law.

Disclosure of your personal data

RSM UK Foundation does not sell, distribute or otherwise make personal data commercially available to any party, except as described in this policy or with your prior permission. RSM UK Foundation may have to share your personal data with:

- Entities in the RSM Group;
- RSM UK Foundation's auditors, insurers or a competent governmental or regulatory body; and
- Other third-party service providers (if any).

Protection of your personal data

RSM UK Foundation takes the security of the personal data it holds seriously. Procedures are in place to safeguard it from loss, misuse and improper disclosure. RSM UK Foundation also has procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where it is legally required to do so.

The RSM Group and any other third party service providers are required to take appropriate security measures to protect your personal information.

To the extent that the processing of personal data involves the transfer of such data to a territory that does not provide an adequate level of protection, RSM UK Foundation shall implement appropriate safeguards in accordance with applicable data protection legislation.

For how long will RSM UK Foundation use your personal data?

RSM UK Foundation will only retain your personal data for as long as necessary to fulfil the purposes RSM UK Foundation collected it for, including for the purposes of satisfying any legal, accounting, regulatory or reporting requirements. To determine the appropriate retention period for personal data, RSM UK Foundation considers:

- The amount, nature, and sensitivity of the data;
- The potential risk of harm from unauthorised use or disclosure of the data;
- The purposes for which RSM UK Foundation processes the data; and
- The applicable legal requirements.

Your legal rights

RSM UK Foundation assumes responsibility for keeping an accurate record of personal data once you have submitted the information to RSM UK Foundation. Please inform RSM UK Foundation of any changes to that information. You are entitled to:

- Request access to your personal data that RSM UK Foundation holds;
- Request the correction or erasure of your personal data that RSM UK Foundation holds;
- Object to the processing of your personal data that RSM UK Foundation holds;
- Request a restriction of processing of your personal data that RSM UK Foundation holds;
- Request the transfer of your personal data that RSM UK Foundation holds to you or to a third party; and
- Withdraw consent at any time, where RSM UK Foundation is relying on consent to process your personal data.

To exercise any of the above rights please contact RSM UK Foundation's Privacy Contact at: nick.sladden@rsmuk.com.

RSM UK Foundation may need to request specific information from you to help it to 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. RSM UK Foundation may also contact you to ask you for further information in relation to your request to assist RSM UK Foundation's response.

Complaints

If you are concerned about an alleged breach of privacy law or any other regulation by RSM UK Foundation please contact the Privacy Contact who will ensure that your complaint is investigated.

You also have the right to complain to the Information Commissioner's Office, the UK supervisory authority for data protection issues.