

## Introduction

We understand that you are aware of, and care about, your own personal privacy interests, and we take that seriously. This Privacy Statement describes Right Cue Consulting Services Limited's ("RightCue") policies and practices regarding its collection and use of your personal data and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Notice as we undertake new personal data practices or adopt new privacy policies.

## Data Protection Officer

RightCue is located in Basingstoke, in the United Kingdom. We are registered with Companies House in England and Wales as Right Cue Consulting Services Limited (Reg. No. 6866953) and with the Information Commissioner's Office under registration number ZA206168.

We have appointed a Data Protection Officer for you to contact if you have any questions or concerns about our personal data policies or practices. RightCue's Data Protection Officer's name and contact information are as follows:

Yogesh Agarwal  
Director  
Right Cue Consulting Services Limited  
9A, Basepoint Enterprise Centre  
Stroudley Road, Basingstoke, RG24 8UP  
Tel: +44(0)1256 406601  
E-mail: [privacy@rightcue.com](mailto:privacy@rightcue.com)

If you are concerned about an alleged breach of privacy law or any other regulation by us, please contact our Data Protection Compliance Manager who will ensure that your complaint is investigated.

If you are not satisfied with our handling of your queries or complaints on data protection, you can call the Information Commissioner's Office on 0303 123 1113.

## How we collect and use (process) personal information

The data we collect and process:

- Client data
- Visitors to our website
- Marketing data

### Client Data

We collect personal information about our clients to provide them with IT Audit, IT Security Consulting, fraud investigations and related professional services. We hold the following information about customers:

- Contact details- name, business address, business email address, business phone numbers including mobile numbers
- Personal information contained in business communications.
- Transaction data including details about services you have purchased from us.

We may receive personal information from our clients about other individuals, e.g. their employees, while providing our services. Any such information provided to us is used solely for such purposes and is handled strictly as per client instructions.

## Visitors to our Website

When you visit our website, we use third-party services to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to various parts of the website. The information is only processed in a way which does not identify any individual.

When you complete a contact form on our website or use the email for enquiries, we will use the information provided by you only for the purpose of providing you with an appropriate response.

## Marketing Data

We hold name and contact details of individuals who have expressed interest in hearing from us about our services or have engaged with us for supply of our services in the past. All direct marketing activities to such individuals shall comply with relevant privacy and regulatory requirements.

## How your personal data is collected

You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- engage us to provide services;
- subscribe to our publications;
- request marketing material to be sent to you;
- complete one of our enquiry forms; or
- provide us with feedback

Apart from receiving personal data directly from you when you engage us to provide services, we may receive personal data from our partners and associates, for example our accreditation bodies.

## When and how we share your personal data

We may share your personal data with:

- our accreditation bodies where this is a requirement for delivering our services
- Sub-contractors or associates who are asked by RightCue to deliver all or some of the services
- Professional indemnity insurers
- IT service providers and cloud service providers who provide data storage, processing, back-up and retrieval services like Microsoft, Xero, Citrix File Sharing system etc.
- Any third parties with whom you require or permit us to correspond.

We do not sell personal information to anyone and only share it with third parties who are facilitating the delivery of our services and communications.

## Transfer of data outside of the EEA

When using cloud software providers to provide you with the services, personal data may be required to be stored outside of EEA if the servers or backup facilities of such cloud providers are located outside of EEA. We verify that any data transfer outside of EEA is subject to EU adequacy requirements, EU-US privacy shield, EU model privacy clauses or Binding Corporate Rules. In situations where data needs to be transferred to a country or a region where these measures do not apply, we will seek explicit consent from you before making such a transfer.

## Automated decision making

We do not use automated decision-making in relation to your personal data.

## Security of your personal information

To help protect the privacy of data and personally identifiable information you provide to us, we maintain physical, technical and administrative safeguards. We update and test our security technology and controls on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or

services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

We are certified to Cyber Essentials Plus and IASME Gold standards which demonstrates our commitment to security and privacy of your personal information.

## **Data storage and retention**

Your personal data is stored by RightCue on its servers, and on the servers of the cloud-based services and IT service providers we engage, as well as in physical forms in our office and at backup and archival facilities. We retain data for the duration of the client's business relationship with us and as per the regulatory data retention requirements.

For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact us at [privacy@rightcue.com](mailto:privacy@rightcue.com).

## **Data subject rights**

This Privacy Notice is intended to provide you with information about what personal data the Firm collects about you and how it is used. If you have any questions, please contact us at [privacy@rightcue.com](mailto:privacy@rightcue.com).

If you wish to confirm that the RightCue is processing your personal data, or to have access to the personal data we may have about you, please contact us at [privacy@rightcue.com](mailto:privacy@rightcue.com).

You have a right to request correction of inaccurate information, deletion of information, and to instruct us to stop processing your information. We are obliged to honour such requests as per the regulatory requirements. If you'd like more information or would like to make such a request, please contact us at [privacy@rightcue.com](mailto:privacy@rightcue.com).