
RM plc

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1. INTRODUCTION

1.1 Background

The RM Group of businesses creates and maintains an extensive range of innovative solutions and services - all designed or selected to meet the specific needs of educational users:

- RM Education provides software, services and technology to schools and colleges in the UK;
- RM Results provides e-assessment services and education data analysis to exam boards and central government in the UK and internationally; and
- RM Resources provides physical and curriculum resources for schools and nurseries in the UK and internationally.

(For the purposes of this Privacy Policy, "RM" and "RM Group" means RM plc (Reg No. 01749877) and The Consortium for Purchasing and Distribution Ltd (Reg No. 03100039), RM Education Ltd (Reg No. 01148594), RM Results, TTS Group Ltd (Reg No. 04373761) and West Mercia Supplies. See the latest RM plc Annual Report for further details about RM.)

1.2 Purpose and scope of this Policy

RM is committed to protecting and respecting the privacy of individuals.

This Privacy Policy outlines how RM collects, stores and uses personal information that it collects about customers, candidates, examiners and visitors to the RM Group websites.

This Privacy Policy is intended for circulation to RM's customers, suppliers and other interested parties. It is supported by an internal data protection framework.

This Privacy Policy is intended for use in conjunction with the RM plc Data Protection Policy (available on request) and the Terms of Website Use (which are available on each RM Group company's website). These documents set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

1.3 Lawful Basis for Processing

We will only Process your Data if there is a lawful basis for such Processing. The lawful basis for Processing Personal Data will be one of the following:

- **Consent.** You have given RM clear and specific consent for Processing your Data.
- **Contract.** You, or the organisation you work for, have entered into a contract in which the Processing of your Data is required.
- **Legal obligation.** We need to Process your Data in order to comply with a common law or statutory obligation.
- **Legitimate interests.** We have a legitimate interest in processing your Data in circumstances where it would be reasonable for you to expect such Data Processing and where there is a minimal privacy impact. Some direct marketing activities may be based on legitimate interests. Where legitimate interest is deemed to apply, RM will have carried out a Legitimate Interest Assessment.

1.4 Contact details:

For the purpose of data protection legislation, the data controller is either:

- (a) The Consortium for Purchasing and Distribution Ltd (which includes the trading entity West Mercia Supplies) ("The Consortium");
- (b) RM Education Ltd (which includes the trading entity RM Results) ("RM Ed"); or
- (c) TTS Group Limited ("TTS"),

which each has their registered office at: 140 Eastern Avenue, Milton Park, Abingdon, Oxon. OX14 4SB.

1.5 RM Group websites

It is possible that our websites contain links to other sites. RM is not responsible for the privacy practices or the content of such websites. The websites may also include comment fields, chat rooms, forums, message boards, and news groups. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information.

Wherever this Privacy Policy refers to a website, we are referring to the applicable one of:

In respect of The Consortium:

<https://www.educationsupplies.co.uk>
<http://www.elderlyactivities.co.uk>
<https://www.theconsortiumcare.co.uk>
<https://www.earlyyears.co.uk>
<https://www.theconsortium.com>
<http://www.fireandrescue.co.uk>
<http://www.studentpacks.com>
<https://www.officeandcommunity.co.uk>
<https://www.theconsortiumworldwide.com>
<https://www.westmerciasupplies.co.uk>

In respect of RM Ed:

<http://www.rm.com>
<https://rmresults.co.uk>
<https://www.rmeasimaths.com>
<https://www.easiteach.com>
<https://www.easilearn.com>
<http://www.helicon.co.uk/>

In respect of TTS:

<https://www.tts-group.co.uk>

1.6 Definitions

RM uses the following definitions in relation to data:

Personal Data (GDPR, Rec.26; Art.4(1)):

*"Personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to **an identifier** such as a name, an identification number, **location data**, online identifier or to one or more factors specific to the physical, physiological, **genetic**, mental, economic, cultural or social identity of that person."*

Special Categories of Personal Data (GDPR, Rec.10, 34, 35, 51; Art.9(1)):

*"Sensitive Personal Data" are personal data, revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; **genetic data or biometric data**. Data relating to criminal offences and convictions are addressed separately (as criminal law lies outside the EU's legislative competence)."*

Data Controller (GDPR, Art.2(d)):

"Controller" means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by EU or Member State laws, the controller may be designated by those laws."

Data Processor (GDPR, Art.2(e)):

“Processor” means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.”

2. HOW PERSONAL DATA IS COLLECTED

2.1 Information you give us

This is information about you that you give us:

- (a) when filling in forms on our websites (listed in 1.4 above);
- (b) by corresponding with us by phone, email or otherwise;
- (c) when you register to use our websites;
- (d) when you subscribe to our services;
- (e) when you place an order on one of our websites;
- (f) when you participate in discussion boards or other social media functions on our websites
- (g) to enter a competition, promotion or survey;
- (h) when attending an RM activity, such as a seminar; and
- (i) when you report a problem with our websites.

The information you give us may include your name, address, e-mail address and phone number, organisation, job role or title, financial and credit card information and some interests / preferences.

2.2 Information we collect about you

Visits to websites

With regard to each of your visits to our websites we will automatically collect the following information:

- (a) technical information, including your login information, the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- (b) information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products 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), methods used to browse away from the page platform and any phone number used to call our customer service number.

Completion of forms

Our site uses various forms to help us manage requests and enter you into competitions. We collect contact information (like names and email addresses). Contact information is used to respond to enquiries, or get in touch with you when necessary. If you have given us your consent to do so, we sometimes use this contact information to send you information about our company and our products and services by phone, email or post.

CCTV

When you visit one of our offices, RM may record CCTV footage of you. The operation of CCTV is governed by the CCTV Policy, which is closely aligned with the ICO's guidance on this subject. A copy of this policy is available upon request.

2.3 Information we receive from other sources

This is information we receive about you if you use any of the websites we operate or other services we provide. In these cases we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on our websites. We will also have told you for what purpose we will share and combine your data.

We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies).

3. WHY PERSONAL DATA IS COLLECTED

3.1 Information you give us

Use of the information

We will use the information you give us:

- (a) to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- (b) to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- (c) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data;
- (d) to notify you about changes to our service;
- (e) to ensure that content from our site is presented in the most effective manner for you and for your computer.

Sharing with RM Group companies

RM's provision of the products or services to you may require the transfer of Data to RM's wholly owned subsidiary, RM Education Solutions India Private Limited ("RMESI"), which operates outside the European Economic Area. India has not been approved by the European Commission as having adequate protections in place for the purpose of the transfer of personal data. You agree that RM will be permitted to transfer your data to RMESI provided that RM shall have entered into an agreement with RMESI based upon standard contractual clauses approved by the European Commission for transfers of personal data to processors outside of the European Economic Area and which agreement shall include security obligations on RMESI.

RM will only transfer Data to RMESI where you have agreed to this. If there is no provision in our agreement for RMESI to process your Data, the Data will remain within the EEA.

RM has a central database which all RM Group companies can access. It is possible that some personal data (such as the name on an invoice, or a contact at a school) will be visible by all RM Group companies.

Sharing with external third parties

We will share your data with external third parties for the following reasons:

- (a) We will share your data with external third parties directly involved in the provision of RM products and services. Your data will be processed in accordance with their privacy policy. Upon confirmation of the product / services you require details about, RM will supply details of any relevant third parties.
- (b) We (or third-party data processors acting on our behalf) may collect, store, and use your personal information for the following purposes, only with your explicit consent:
 - Service requests (including enquiry response)
 - Electronic marketing

RM uses some services and / or products from external third parties in order to provide the services you have requested. This may include (by way of example only) third parties that provide online storage and other facilities. If RM becomes aware of any such third party wishing to transfer your data outside the European Economic Area, RM shall request that the third party enters into an agreement with RM based upon standard contractual clauses approved by the European Commission for transfers of personal data to processors outside of the European Economic Area and which agreement shall include security obligations on such third party.

Marketing

We collate the information collected about you in order to offer you a more tailored marketing experience.

3.2 Information we collect about you

We will use the information we collect about you:

- (a) to administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (b) to improve our websites to ensure that content is presented in the most effective manner for you and for your computer;
- (c) to allow you to participate in interactive features of our services, when you choose to do so;
- (d) as part of our efforts to keep our websites safe and secure;
- (e) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- (f) to make suggestions and recommendations to you and other users of our websites about goods or services that may interest you or them.

Sharing with RM Group companies

RM's provision of the products or services to you may require the transfer of Data to RM's wholly owned subsidiary, RM Education Solutions India Private Limited ("RMESI"), which operates outside the European Economic Area. India has not been approved by the European Commission as having adequate protections in place for the purpose of the transfer of personal data. You agree that RM will be permitted to transfer your data to RMESI provided that RM shall have entered into an agreement with RMESI based upon standard contractual clauses approved by the European Commission for transfers of personal data to processors outside of the European Economic Area and which agreement shall include security obligations on RMESI. By submitting your personal data, you agree to this transfer, storing or processing.

RM may share your information with Group companies for marketing purposes, as a legitimate business purpose.

Sharing with external third parties

We will share your data with external third parties for the following reasons:

- (a) We will share your data with external third parties directly involved in the provision of RM products and services. Your data will be processed in accordance with their privacy policy. Upon confirmation of the product / services you require details about, RM will supply details of any relevant third parties.
- (b) We (or third-party data processors acting on our behalf) may collect, store, and use your personal information for the following purposes, only with your explicit consent:
 - Service requests (including enquiry response)
 - Electronic marketing

RM uses some services and / or products from external third parties in order to provide the services you have requested. This may include (by way of example only) third parties that provide online storage and other facilities. If RM becomes aware of any such third party wishing to transfer your data outside the European Economic Area, RM shall request that the third party enters into an agreement with RM based upon standard contractual clauses approved by the European Commission for transfers of personal data to processors outside of the European Economic Area and which agreement shall include security obligations on such third party. By submitting your personal data, you agree to this transfer, storing or processing.

Marketing

We collate the information collected about you in order to offer you a more tailored marketing experience.

For marketing purposes, we may collect, store and use the following kinds of personal data:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type, referral source, length of visit and number of page views);
- (b) information that you provide to us for the purpose of registering with us (including name, company, telephone number and email address); and
- (c) any other information that you choose to send to us.

We will use this information to send to you marketing communications relating to our business which we think may be of interest to you by post or by email (if you are an individual, we will have specifically obtained your consent for this) or similar technology. You can inform us at any time if you no longer require marketing communications.

IP addresses

The Internet protocol (IP) address used to connect your computer to the Internet. We use your IP address for the following purposes:

1. Ops issue triage: if you notify us of an issue, or our monitoring identifies an issue, then the information within the servers' logs is used to identify the root cause and, wherever possible, identify a fix.
2. Issue trending: this provides us with aggregated trend data so we can monitor the quality of the service year-on-year.
3. Application usage data: we use server logs to review system usage, both for issue triage and for service reporting year-on-year.
4. Service analytics data: we do Pingdom and Microsoft to gather analytical data.

Cookies

We use cookies on our websites to improve your experience on the websites, mainly so that we don't have to ask you for your information on every page you visit. It also allows us to personalise the information shown to be closer to your interests.

We (or third-party data processors acting on our behalf) may collect, store, and use your personal information for individual website experience improvement.

For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy which can be found on every RM Group website.

4. DISCLOSURE OF YOUR INFORMATION

Sharing your personal information

You agree that we have the right to share your personal information with:

- (a) Any member of the RM Group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- (b) Selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
 - advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
 - analytics and search engine providers that assist us in the improvement and optimisation of our websites; and
 - credit reference agencies for the purpose of assessing your credit score where this is a condition

of us entering into a contract with you.

Disclosure to third parties

We will disclose your personal information to third parties:

- (a) In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- (b) If any RM Group company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- (c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of any of our RM Group companies, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

5. WHERE WE STORE YOUR PERSONAL DATA

Locations

The data that we collect from you will be transferred to, and stored at:

- (a) Third party cloud-hosted environments, e.g. Microsoft Azure, using servers that reside only in EEA.
- (b) Third party data centres, using servers that reside only in the UK.
- (c) A destination outside the European Economic Area ("EEA") Your personal data may be processed by staff operating outside the European Economic Area ("EEA") who work for us (employed by our wholly-owned subsidiary, RM Education Solutions India Pvt) or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Security

RM uses a range of security measures in order to protect Personal Data, managed through a Group Information Security Framework, based on ISO 27001, the international standard for information security management. In addition, a number of business units are certified to ISO 27001:2013. Further details are available upon request to the Data Protection Officer (details below).

A wide range of technical controls are used, including but not limited to:

- Data encryption
- Anti-virus and anti-malware software
- Network monitoring
- Access management
- Vulnerability scanning and penetration testing

A wide range of non-technical controls are used, including but not limited to:

- Physical security controls at RM offices
- Security policies, including Data Classification & Handling, Data Protection, etc.
- Security training

The implementation of such controls may vary between specific products and services.

Security: websites

All websites have security measures in place to protect the loss, misuse and alteration of the information under our control. Where necessary RM will inform law enforcement agencies or other relevant organisations regarding misconduct.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted and utilise technologies to ensure PCI DSS compliance. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our websites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6. DATA RETENTION

RM has established a data retention framework based on statutory and non-statutory guidance. The framework applies to both digital and non-digital data. In regard to the retention of personal data of individuals who are neither employees nor former employees, data retention schedules will be applied in accordance with the following:

- (a) Contracts
- (b) Product-specific and service-specific data retention schedules

Data retention schedules will be documented and will be communicated, either through terms and conditions of the relevant product and / or service, or upon request.

7. YOUR RIGHTS

Individuals' Rights

In accordance with data protection legislation, RM recognises that data subjects have specific rights that must be protected and observed.

Right to be informed

RM provides employees, customers and other third parties with information about how personal data is collected, processed and managed. RM seeks to provide this information in language that is clear, concise and intelligible. This information is intended to be easily accessible for internal and external users.

Right of access

RM provides data subjects with access to the personal data that it manages as a data controller. A Subject Access Request (SAR) process has been defined (see paragraph 8 below) and communicated. Data subjects for whom RM is not the data controller but may process their personal data, should – in the first instance – contact the data controller directly when requesting such access.

Right to rectification

RM recognises the right of individuals to have inaccurate or incomplete data to be amended. Data subjects for whom RM is not the data controller, should – in the first instance – contact the data controller when making a data rectification request.

Right to erasure

RM recognises the right of individuals to request for their data to be deleted or removed where there is no compelling reason for its continued processing. RM will, in all cases, follow the ICO's guidance on how and when such a request should be observed.

RM maintains a data retention schedule so that personal data is not retained for longer than is necessary with regard to the purpose for which the data was originally collected. However, some personal data may be required to be retained in order to observe other legal or regulatory obligations. In addition, in line with the ICO's guidance

on the constraints that existing when deleting data retained in digital back-ups, RM will seek to place such back-ups beyond effective use.

Right to data portability

Where the right of portability applies, as defined by the ICO, RM will provide data in a form that is structured, commonly used and in a machine readable form. In most cases, this will be the CSV format.

Right to object

RM recognises the right of individuals to object to the processing of their personal data, where such objections are allowable under data protection legislation.

Rights related to automated decision making including profiling

RM does not use automated decision making where such decisions have a significant effect on data subjects.

Withdrawing consent

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the details set out in paragraph 10 below.

In "My Account", there is a privacy dashboard. If you register, you will get an RM account. That will give you access to an area to show your preferences for communication.

Each time you receive electronic marketing information from us, you have the option to decline to receive further marketing information from us.

To stop receiving email communications from RM in the future, you can:

1. click on the opt-out link in the email and follow the instructions; or
2. reply to the email with "UNSUBSCRIBE" in the subject line; or
3. for RM Education Limited customers only, visit rm.com/unsubscribe and provide your email address.

If you change your preferences, we will endeavour to ensure our systems reflect this within one (1) week of receiving your alteration.

Please note that if you terminate your RM account, but have also subscribed to newsletters, for example, you must additionally unsubscribe from these in order to cease receiving communication. This also applies to any third parties you have agreed we can share your information with.

To prevent you receiving such communications from RM in the future, you can send a letter clearly identifying yourself and asking that we remove you from our contact lists. Contact details are set out in paragraph 10 below.

Third party websites

Our websites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Right of complaint to the ICO

Should you have a concern about RM's information rights practices, please report it to us for investigation. If, following our internal review, you are not satisfied, you can report the matter to the Information Commissioner's Office.

8. SUBJECT ACCESS REQUESTS

The Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with such legislation.

Upon receipt of a written request to our Data Protection Officer (see paragraph 10 below for contact details), RM will within thirty (30) days:

- (a) confirm whether any of your personal data is being processed;
- (b) provide a description of the personal data, the reasons it is being processed and whether it is given to any other organisations; and
- (c) if it is not disproportionate to do so, provide copies of the information comprising the data.

If the request is particularly complex or numerous, RM may extend the period for response by up to two (2) months.

If the request is manifestly unfounded or excessive, RM may charge a fee or refuse to respond.

If disclosing the personal data will adversely affect the rights and freedoms of others, RM may withhold such personal data. This may extend to intellectual property and trade secrets.

9. CHANGES TO OUR PRIVACY POLICY

Any changes we make to the Privacy Policy in the future will be posted on each website. Please check back frequently to see any updates or changes to this Privacy Policy.

10. CONTACT

If you have any questions or comments about this Privacy Policy, please contact our Data Protection Officer:

RM Data Protection Officer
140 Eastern Avenue
Milton Park
Abingdon, Oxfordshire
OX14 4SB
United Kingdom

Telephone: +44 (0) 8450 700300

Fax: +44 (0) 8450 700400

Email: dataprotection@rm.com

11. RM CAREERS PRIVACY STATEMENT

We understand that when searching for employment a large amount of personal and highly confidential data is disclosed and we take our responsibility to protect this very seriously. This section 11 sets out the basis on which any personal data we collect from you, or you provide to us, will be processed by RM Careers.

Information we may collect

We generally collect information contained in your CV, or submitted with your application form or personal information form such as name, address, home phone number, work phone number, mobile phone number(s), facsimile numbers, e-mail addresses and general contact information to facilitate RM to be able to readily communicate with you. We also collect additional personal information such as your CV.

We collect and may disclose statistical information gathered as a whole (e.g. total number of applicants and applicant origin) for internal reporting purposes. However, we never disclose information that identifies any individual for such purposes.

We do not knowingly solicit information from children and we do not knowingly market our services to children.

If you opt to provide date of birth, sex, marital status or nationality information, this information is gathered for diversity monitoring and reporting only and will not be used in the recruitment and selection process.

How we may use this Information

RM gathers the personal information required for you to be considered for job vacancies within RM and to conduct research relating to our recruitment activities. Generally, the information gathered from you is used to assist you to search for RM job vacancies, apply for RM job vacancies and to be processed for each job application you submit. As such, it may require us to release your personal information with your consent to RM hiring managers, administrators and third party contractors. These RM hiring managers, administrators and third party contractors may be in the UK or in other parts of the world including outside the European Economic Area ("EEA"). By registering with RM, you agree that your information may be shared with RM hiring managers, administrators and third party contractors for the purpose of supporting you to find suitable RM job vacancies, applying for RM job vacancies, supporting our research relating to our recruitment activities and processing you for each job application you submit and you consent to the transfer of your information outside the EEA.

RM uses all reasonable means to ensure that third party sources use your personal information only for the purposes for which it was provided and in adherence to the RM Privacy Policy. However, RM is not responsible for any improper use of your personal information that is beyond our reasonable control.

Where we store your personal data

Your personal information is stored on a secure server hosted by an RM approved contractor. The server resides in the EEA.

RM is a global organisation, therefore, your data may be transferred to any of our operating businesses throughout the world with your consent, for the purpose of being considered for any RM job vacancy you apply for, or for being matched to specific RM job vacancies and being contacted by a RM hiring manager, administrator or third party contractor to discuss your interest and suitability.

By submitting your personal information, you agree to RM transferring, storing and processing your personal information outside the EEA. In particular, you agree to our wholly owned subsidiary, RM Education Solutions India Pvt, processing your data outside the EEA.

How long is your personal data retained

If your application was unsuccessful, we will retain your personal data for a period of twelve (12) months, before deleting the same.

12. DOCUMENT MANAGEMENT

12.1 Related Documents

Document	Date
Data Protection Act	1998
General Data Protection Regulation	2016

12.2 Change Management

This document will be reviewed no less than yearly. It may be updated as part of the review process.