



Online Privacy Statement

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1 INTRODUCTION

This is the online privacy statement for Railton Consultants Ltd (RCL). It is the policy of RCL to respect the privacy of all people. This Privacy Statement informs you of our privacy practices. This statement is readily available on our web site.

2 OVERVIEW

We are in the process of implementing an Information Security Management System (ISMS) within our organisation, based on the German *Bundesamt für Sicherheit in der Informationstechnik* (BSI) standard. It is anticipated that this online privacy statement forms part of our compliance with this system and will be reviewed at least annually as part of our security review process.

RCL complies with the UK data protection act. In accordance with the Data Protection Act, it is not our policy to store any personal information outside the EEA. It is currently not our policy to capture information about individual online users in any way. However, this may change in the future if required to support our business processes.

In the development of RCL's privacy policies and standards, we have endeavoured to take into account the normally accepted principles regarding privacy that have been established around the world, in particular the EU Directive 95/46/EC, APEC Privacy Framework, and the Madrid Resolution on International Privacy Standards.

If you have questions or complaints regarding our Privacy Statement or practices, please contact RCL using the contact information included in this Statement

3 STATEMENT

3.1 Scope

This Privacy Statement applies to all RCL-owned websites, domains, services, applications, and products ("RCL sites or services"), except that a privacy policy or statement specific to a particular RCL program, product, or service may supersede or supplement this privacy Statement.

RCL sites or services may provide links to third-party applications, products, services, or websites for your convenience and information. If you access those links, you will leave the RCL site. RCL does not control those third party sites or their privacy practices, which may differ from RCL's practices. We do not endorse or make any representations about third-party sites. The personal data you choose to provide to or that is collected by these third parties is not covered by the RCL Privacy Statement. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your personal information.

We may also provide social media features that enable you to share information with your social networks and to interact with RCL on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites with which you interact to make sure you understand the information that may be collected, used, and shared by those sites.



3.2 Collection of personal information

RCL may collect and use personal information to improve and personalise your interaction with our systems at RCL. Such collection will be done with appropriate notice and consent, along with required filings with data protection authorities.



RCL may collect personal information from you to complete various transactions, such as:

- product or service orders, activations, and registrations
- profile creation and user verification
- information requests
- marketing or support activities
- contest entries or survey participation
- job applications

The types of personal information you provide to us may include:

- contact information such as name, address, telephone number, and email address
- financial information such as your credit/debit card number or other billing information
- government issued identification numbers
- other unique information such as user IDs and passwords, product and service preferences, contact preferences, educational and employment background, and job interest data

In some cases, your business contact data may have to be provided to RCL by a designated entity within your business or enterprise (such as a member of your IT department making a support enquiry).

If you post, comment, indicate interest or complaint, or share personal information, including photographs, to any public forum on an RCL site, social network, blog, or other such forum, please be aware that any information you submit can be read, viewed, collected, or used by other users of these forums, and could be used to contact you, send you unsolicited messages, or for purposes that neither you nor RCL have control over. RCL is not responsible for the personal information you choose to provide in these forums.

In addition to the information you provide, RCL may also collect information during your visit to an RCL website, web-based application, or a website "powered by" another company on behalf of RCL, through Automatic Data Collection Tools (ADCT), which could include Web beacons, cookies, and embedded Web links. These tools collect certain traffic information that your browser sends to a website, such as your browser type and language, access times, and the address of the website from which you arrived. They may also collect information about your Internet Protocol (IP) address, unique device identifier, and the pages you view, the links you click, and other actions you take in connection with RCL websites or related websites and product information. Third parties acting on RCL's behalf may also use some of these ADCT in connection with certain emails and communications sent on behalf of RCL and therefore may collect information using these tools when you open the email or click on a link contained in the email (see Appendix A for more information).

RCL may also collect information from publicly or commercially available sources that it deems credible. Such information may include your name, address, email address, preferences, interests, and demographic/profile data. The information RCL collects from its public or commercial sources may be used along with the information RCL collects when you visit RCL's sites. For example, RCL may compare the geographic information acquired from commercial

sources with the IP address collected by Automatic Data Collection Tools to derive your general geographic area.

3.3 Use of your information

The information RCL collects to understand your needs and interests helps RCL deliver a consistent and personalised experience. For example, RCL may use your information to



- assist you in completing a transaction or order
- prevent and detect security threats, fraud or other malicious activity
- communicate with you about products and services
- provide and improve service and support
- update you on new services and benefits
- provide personalised promotional offers
- select content to be communicated to you
- personalise some RCL websites
- measure performance of marketing initiatives, ads, and websites provided by another company on RCL's behalf
- allow you to participate in contests and surveys
- contact you regarding RCL products or services

We will give you the opportunity to choose your privacy preferences regarding the marketing communications we send (see Privacy Preferences below).

Credit card information is used only for payment processing and fraud prevention. Government issued identification numbers and other sensitive personal information are not used for any other purpose by our financial services providers or RCL and will not be kept longer than necessary for providing the services, unless you ask us to retain your credit card information for future purchases.

3.4 Sharing of information

RCL will not sell, rent or lease your personal information to others except as described in this Statement. RCL shares personal information in the following ways:

RCL may retain service providers and suppliers to deliver products or services and assist RCL with marketing and communication initiatives. These providers and suppliers include, for example, credit card processors, providers of support and help, marketing, email service providers, automated data processors, and shipping agents. As far as practicably possible suppliers and service providers will be required to keep confidential and secure the information received on behalf of RCL and may not use it for any purpose other than to carry out the services they are performing for RCL.

If you choose to provide personal information to the other companies with which RCL is involved, it must be borne in mind that such personal information will be handled according to the privacy policy of those companies, which may differ from RCL's policies and practices.

Except as described in this Statement, RCL will not share the personal information you provide to RCL with non-RCL third parties without your permission, unless to:

- respond to legitimate information requests of police and governmental authorities;
- comply with any law, regulation or court order;
- investigate and help prevent security threats, fraud or other malicious activity

- enforce/protect the rights and properties of RCL or its subsidiaries
- protect the rights or personal safety of RCL, our employees, and third parties on or using RCL property when allowed and in line with the requirements of applicable law.

Circumstances may arise where, whether for strategic or other business reasons, RCL decides to sell, buy, merge or otherwise reorganise businesses in some countries. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of it from sellers. It is RCL's practice to seek appropriate protection for information in these types of transactions.



3.5 Children's privacy

RCL does not knowingly collect information from children under the age of 18, and does not target its websites to children under this age. We encourage parents and guardians to take an active role in their children's online and mobile activities and interests.

3.6 Privacy preferences

RCL will give you the choice of receiving information that complements our products and services. You may subscribe to receive certain product- and service-specific information and also choose to receive RCL general communications. We will give you a choice regarding delivery of RCL general communications by postal mail, email, telephone, or mobile device.

You can make or change your choices about receiving either subscription or general communications at the data collection point or by using other methods, listed below. This option does not apply to communications primarily for the purpose of administering orders, contracts, support, safety warnings, updates, or other administrative and transactional notices where the primary purpose of these communications is not promotional in nature.

If an automated approach to removing subscription or general communications appears not to work, or is inaccessible, please write to the RCL address given below and we will ensure the communications are ended. You must provide your name, relevant contact information, and specific relevant information about the RCL subscriptions that you no longer wish to receive.

Please be aware that, when you opt out of receiving certain subscription or general communications, it may affect the services you have chosen to receive from RCL where accepting the communications is a condition of receiving the services.

3.7 Access to and accuracy of your information

RCL strives to keep your personal information accurately recorded. We also try to improve our information management processes and policies to help maintain data accuracy. RCL provides individuals with reasonable access to personal information that they supply to RCL together with the reasonable ability to review and correct it or ask for obscuring, or deletion, of information as applicable. To protect your privacy and security, we will also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your data. To view and change the personal information that you directly provided to RCL, you can return to the system where you originally submitted your data and follow the instructions on that web page, or contact RCL by post.

3.8 Information security

RCL takes information security very seriously. To prevent unauthorised access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, RCL utilises reasonable and appropriate physical, technical, and administrative procedures to safeguard the information we collect and process. RCL retains data only as required or permitted by law and while it has a legitimate business purpose.



When collecting or transferring sensitive information such as credit card information we will use appropriate security technologies and procedures to help protect your personal information from unauthorised access, use, or disclosure. The personal information you provide us is stored on computer systems located in controlled facilities which have limited access. If we need to transmit highly confidential information (such as credit card number or password) over the internet, we protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Credit card numbers will only be used only for processing payments and are not used for other purposes.

3.9 Changes to this statement

If we modify our Privacy Statement, we will post the revised statement on our website, with an updated revision and date. If we make significant changes to our statement that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on our website and/or social media pages prior to the changes taking effect.

3.10 Contacting us

If you have comments or questions about this privacy statement, or wish to request removal from subscription or general communications please send this request to the following address:

Railton Consultants Ltd
Fromehall Mill
Lodgemore Lane
STROUD
GL5 3EH
United Kingdom

APPENDIX A - AUTOMATIC DATA COLLECTION TOOLS

The following sections provide additional information about commonly-used web technology based automatic data collection tools.



Cookies

A "cookie" is a small data file transferred by a website to your computer's hard drive. RCL or its service providers may send cookies when you visit our sites or sites where advertisements appear, make purchases, request or personalise information, or register yourself for certain services. Accepting the cookies used on our site, sites that are provided by another company on RCL's behalf, or sites where our advertisements appear may give us access to information about your browsing behaviour, which we may use to personalise your experience. Cookies are typically classified as either "session" cookies or "persistent" cookies.

Session cookies do not stay on your computer after you close your browser.

Persistent cookies remain on your computer until you delete them or they expire. Most browsers automatically accept cookies by default, but you can usually refuse cookies or selectively accept cookies by adjusting the preferences in your browser. If you turn off cookies, there may be some features of our sites that will not be available to you and some Web pages may not display properly.

You can find information on popular browsers and how to adjust your cookie preferences in the help and support section of your browser.

RCL may use Flash local shared objects (LSOs) to store Flash content information and preferences. LSOs perform similar functions to browser cookies and deposit small files on your computer, which are commonly called Flash cookies. Flash cookies are different from browser cookies and cookie management tools provided by your browser may not remove Flash cookies. To learn more about Flash Cookies and how to manage the related privacy and storage settings, please visit the Adobe Systems website.

Web beacons

It is not our policy to use Web beacons. However, some RCL and third-party web pages, applications, and HTML-formatted email could use Web beacons alone or in conjunction with cookies to compile information about your website usage and your interaction with email, as well as to measure performance of applications, and websites provided by another company on RCL's behalf. A web beacon is an electronic image, called a single-pixel (1x1) or clear GIF. Web beacons can recognise certain types of information on your computer such as cookies, the time and date of a page viewed, and a description of the page where the web beacon is placed. Depending on the context, web beacons may also refer to content on a third-party server, and may be used by service providers to deliver relevant advertising to you.

You may be able to disable web beacons in email messages by not downloading images contained in the message you receive (this feature varies depending on the email software used on your personal computer). However, doing this may not always disable a web beacon or other automatic data collection tools in the email message due to specific email software capabilities. For more information about this, please refer to the information provided by your email software or service provider.

If you choose to receive marketing emails or newsletters from RCL as specified in Privacy Preferences above, RCL may decide to collect automatically personal information about you. For example, whether you've clicked on links contained within email messages. For more information on embedded web links, see below.

Embedded Web links

Emails from RCL may use links designed to lead you to a relevant area on the Web, after redirection through RCL's servers. The redirection system can allow RCL to change the destination URL of these links as part of our marketing initiatives.



In subscription emails, such web links may also allow RCL to determine whether you have clicked a link in an email, and this information about the interaction may be connected to your personal identity. If you do not want RCL to collect information about the links that you click, you should unsubscribe from emails from RCL.

Advertisements on third-party websites

RCL may contract with service providers to place advertisements on websites owned by third parties. In addition, some websites may be supported by a service provider on RCL's behalf. These service providers may send cookies from and use web beacons on these third-party websites. The cookies and web beacons may enable RCL to collect information about the pages you viewed and the links you clicked.