

RV2 Power Ltd - Privacy Policy: Version: [18.07.2023]

The <https://www.rv2power.com/> ("Website") is operated by RV2 Power Ltd (company number 06549631) ("RV2"). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

RV2 takes your privacy very seriously and is committed to protecting your personal data. Please read this privacy policy carefully as it will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), purchase services from us or otherwise interact with us and it tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and is not intended to override them.

Please use the Glossary at the end to understand the meaning of some of the terms used in this privacy policy.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

Given the nature of our website, we do not expect to collect the personal data of anyone under 13 years old. If you are aware that any personal data of anyone under 13 years old has been shared with our website, please let us know so that we can delete that data.

This privacy policy is divided into the following sections:

1. Important Information and who we are
2. Personal data we collect about you
3. How your personal data is collected
4. How and why we use your personal data
5. Marketing
6. Who we share your personal data with
7. Transferring data
8. Cookies
9. Your rights
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11. Data security
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1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how RV2 collects and processes your personal data through your use of this website, including any data you may provide to us or through this

website when you sign up to our newsletter, contact form, quote forms, purchase services or take part in a competition.

Controller

RV2 is the controller and responsible for your personal data (collectively referred to as “company”, “we”, “us” or “our” in this privacy policy).

We have appointed a Privacy Manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Privacy Manager using the details set out below. In the Privacy Manager’s absence please contact the Deputy Privacy Manager. Our contact details are:

Full name of legal entity: RV2 Power Ltd

Name of Privacy Manager: Tony Simmonds

Email address: tony.simmonds@rv2power.com

Postal address: Unit 5 Nano Park, Kelly Way, Wakefield, WF29FW

Telephone number: 03301180089

You have the right to make a complaint at any time to the Information Commissioner's Office (“ICO”), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was introduced on 18.07.2023 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. Personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified (“Personal Data”). It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity data includes first name, maiden name, last name, title, date of birth and gender.
- Contact Data includes billing address, site address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.

- Transaction Data includes details about payments to and from you and other details of services you have purchased from us.
- Technical Data includes IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your orders and enquiries made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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 privacy policy.

We do not collect any 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). Nor do we collect any information about criminal convictions and offences.

If you fail to provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

Sometime, you can choose if you want to give us your personal data and let us use it. Where that is the case we will tell you how and give you the choice before you give your personal data to us. We will also tell whether declining to share that personal data will have any effect on how you use our services.

We collect and use this personal data for the purposes described in the section 'How and why we use your personal data' below.

3. How your personal data is collected

We use different methods to collect data from and about you including through:

- Directly through direct interactions - you may give us your Identity, Contact and Financial
- Data by filling in forms or by corresponding with us by post, phone, email, on our website or otherwise. This includes personal data you provide when you:
 - apply for our services:

- a. subscribe to our services or publications;

- b. request marketing to be sent to you;
- c. enter a competition, promotion or survey; or
- d. give us some feedback

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:

- Technical Data from our analytics providers such as Google based outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House, the Land Registry, Barbour ABI and the Electoral Register based inside the EU.
- Identity and Contact Data from third parties such as sub-contractors.
- Indirectly through your browsing activity while on our website; we will usually collect information indirectly using the technologies explained in the section on 'Cookies'.

4. How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, for example:

- Where you have given consent
- To comply with our legal and regulatory obligations
- For the performance of a contract with you or to take steps at your request before entering into a contract, or
- For our legitimate interests of those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see 'How to contact us' below).

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

As such, we will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the circumstances set out below. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal

bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

What we use your personal data for	Type of data	Lawful basis for processing including basis of legitimate interest
Create and manage your account with us / to register you as a new client	(a) Identity (b) Contact (c) Profile	For our legitimate interests, i.e., to be as efficient as we can so we can deliver the best service to you at the best price and; To perform our contract with you or to take steps at your request before entering into a contract.
Providing services to you such a processing and delivering your order including: a. Managing payments, fees and charges; b. Collecting and recovering money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and communications	a. To perform our contract with you or take steps at your request before entering into a contract. b. Necessary for our legitimate interests (to recover debts due to us)
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	To comply with our legal and regulatory obligations and; for our legitimate interests.	To comply with our legal and regulatory obligations and; for our legitimate interests.
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: - To comply with our legal and regulatory obligations - In other cases, for our legitimate interests i.e., to protect out business, inerests and rights.	Depending on the circumstances: - To comply with our legal and regulatory obligations In other cases, for our legitimate interests i.e., to protect out business, inerests and rights.
To manage our relationship with you which will include:	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you

(a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(d) Marketing and Communications	(b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our business)

Please see the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will use your personal data in the following circumstances:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any external companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of purchasing a service, service experience or other transactions.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations outside RV2's group for marketing purposes.

6. Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our services to you, eg payment service providers, warehouses and delivery companies
- other third parties we use to help us run our business, eg marketing agencies or website hosts and website analytics providers

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations
- our professional advisers (such as lawyers and other advisers), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

7. Transferring your personal data out of the UK (international transfers)

The data that we collect from you is stored in the UK however it is also transferred and processed outside of the European Economic Area ("EEA").

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. Cookies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

9. Your rights

You generally have the following rights, which you can usually exercise free of charge.

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Access to a copy of your personal data	The right to be provided with a copy of your personal data
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	The right to object: —at any time to your personal data being used for direct marketing (including profiling) —in certain other situations to our continued use of your personal data, eg where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims.

Not to be subject to decisions without human involvement The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

We do not make any such decisions based on data collected by our website.

The right to withdraw consents

If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time

You may withdraw consent by contacting RV2 Power using the email address hello@rv2power.com or by phoning 03301180089

Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

What we may need from you

We may need to request specific information from you to help us 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. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the information commissioner in the UK. They may be contacted using may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

11. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

12. Data retention

How long will you use my personal data for?

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set out below.

- **Clients:** Data for clients is generally retained for 15 years after the purchase of each service to comply with legal and industrial regulatory requirements.
- **Enquiries:** Data for potential clients who have enquired about our services is generally retained for up to 2 years after each enquiry.
- **Recruitment Records:** Information relating to unsuccessful applicants will be kept for up to 1 year from the date which it was decided not to proceed with the latest application. This data will be used to assist the recruitment process to keep a record of the names of applicants who have been shortlisted or interviewed.
- **Disposal of Records:** all Personal Data will be disposed of in a way that protects the rights and privacy of Data Subjects.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for 7 years after they cease being clients for tax purposes however due to industrial regulatory purposes we shall retain this for 15 years.

In some circumstances you can ask us to delete your data: see “Request erasure” below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

13. Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

14. How to contact us

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

hello@rv2power.com

03301180089

Glossary

Lawful Basis	Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
Performance of Contract	Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
Comply with a legal or regulatory obligation	Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
Third Parties	External Third Parties Service providers based in the UK who provide IT and system administration services. Professional advisers including surveyors, architects, tradesmen, lawyers, bankers, auditors and insurers

	<p>based in the UK who provide construction, consultancy, banking, legal, insurance and accounting services.</p> <p>HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.</p> <p>Sub-contractors, the Land Registry and the local council departments if we need to pass on your details for any reason in connection with an order or an enquiry.</p>
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