

How RMI Manages & Protects Personal Information



1. Overview

Data privacy is taken very seriously by RMI Ltd. It is important that you, our client, know exactly what we do with the personal information you, your organisation, and others provide to us, why we gather it and what it means to you. This document outlines our approach to Data Privacy to fulfil our obligations under the General Data Protection Regulation (2018). We also welcome it as an opportunity to reassure you of the importance we place on keeping your personal data secure, and of the strict guidelines we apply to its use. Areas that we wish to highlight are:

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This notice applies to all of RMI's products and services. Your product or service terms and conditions will specify what personal information, if any, we require from you or the employees of your organisation, for what purposes and how it is managed, stored and securely disposed of once the lifecycle of that data, (the product or project lifecycle), is complete. If you have any questions about how your information is gathered, stored, shared or used, please contact our Data Protection Officer. You have a number of rights in relation to your information, including the right to object to processing of your personal information for direct marketing or where the legal basis for our use of your data is our legitimate business interests or performance of a task in the public.

2. Who we are

Throughout this document, “we”, “us”, “our” and “ours” refer to RMI Ltd. “RMI Ltd” means:

- “The Company of RMI Ltd” incorporated in Ireland with Limited Liability
- Registered Office: 2055, Citywest Business Park, Naas Road, Dublin, D24 X2XT
- Registered No: 149590

3. The information we may collect about you

There are a number of reasons that RMI may gather and manage information about you. For instance, for normal business purposes, we need to know how to get in touch with you. Therefore, we will have a range of contact information for you. Additionally, for some of our services that you or your organisation subscribe to with RMI, we need to be certain of your identity and (possibly) medical information. In general, this information is provided by you or your organisation to RMI so that we can support contingency responses to assist you when an event occurs. RMI also undertakes investigation services on behalf of its clients. Therefore, we may also gather open source information with regards to an individual(s) and/ or organisation.

In general, the information we collect falls into various categories.

- Identity & contact information:
 - Name, contact details
 - Where the service requires - date of birth, copies of ID, online user, Twitter handle, Facebook profile, internet protocol addresses, marital status, family details.

- Financial details/circumstances, Assets, Titles & Qualifications:
 - Information with regards to financial details, assets, titles, qualifications and related circumstances may be gathered and managed by RMI, primarily under its investigation service.
 - Where provided by you, (as background reference material) or a 3rd party, (commercial data service; employing organisation; partner; family), RMI may act as data processor for your employment status and employment details,
 - Under its investigation services RMI may gather information about a person's credit history, credit assessment records, credit data from credit registers, credit agency performance data, investment details, and details relating to accounts transferred to the National Asset Management Agency.

- Marital status, dependents and/or financial associations:
 - Information with regards to marital status, dependents and financial associations may be gathered and managed by RMI, primarily under its investigation, protection and response services¹
 - If you are married or are linked to another person in the context of a particular product or service, an association may be created between your records and their records, including any previous and subsequent names used by you
 - These links will remain on your and their files until such time as you cease to subscribe to the service (Protection & Response) or the related project is closed, (Investigations)

- Information you provide us about others or others provide us about you:
 - If you give us information about someone else (for example, information about a spouse or associate provided during the course of project), or someone gives us information about you, we may add it to any personal information we already hold and we will use it in the ways described in this Data Privacy Notice.

Before you disclose information to us about another person, you should be sure that you have their agreement to do so. You should also show them this Data Privacy Notice. You need to ensure they confirm that they know you are sharing their personal information with us for the purposes described in this Data Privacy Notice.

- Sensitive categories of data:
 - We may hold information about you which includes sensitive personal data, such as health or criminal conviction information. We will only hold this data when we need to for the purposes of the service or project we provide to you or where we have a legitimate business interest or defence of claim interest to do so.
 - Examples of when we use this type of data include:

¹ Protection & Response Services: RMI offers protection and response services to organisations and individuals. This, by its nature, requires additional information to assist in responding, location and verifying the status of individuals. These services are subscription based, i.e. the individual or the organisation employing the individual provides the relevant data.

- Medical information, for example, where a pre-existing medical condition exists that may impact on you where an operational risk presents itself.
 - If you have criminal convictions, we may process this information in the context of our investigation² service.
- Information about you provided by others:
 - If you give us information about someone else, or someone gives us information about you, (for example, where another person provides your information to us during the course of a project), we may add it to any personal information we already hold and use it in the ways described in this Data Privacy Notice.
 - Information which you have consented to us using:
 - Where you agree for RMI directly, or RMI as a contracted 3rd party to your current / potential employer, to undertake background checking using data you have provided
 - Your agreement to allow us contact you through certain channels as per your own private or your organisation's contingency planning.
 - Information from online activities:
 - We collect information about your internet activity using technology known as cookies, which can often be controlled through internet browsers³.
 - We collect information about your internet browser settings or otherwise Internet Protocol (IP) and other relevant information to help us identify your geographic location when providing you with our services.
 - Other personal information:
 - Telephone and image recordings.
 - CCTV images at our offices (but only for security reasons and to help prevent crime).
 - Information in relation to data access, correction, restriction, deletion, porting requests and complaints
 - Sometimes we may collect and use your information even though you are not a customer of ours. For example, you may be a beneficiary, guarantor, director, asset holder, representative or party that a customer of RMI's has a legitimate business or defence of claim interest in. If so, we will apply the principles outlined in this Data Privacy Notice when dealing with your information.

4. When and how we gather the information about you

As you use RMI's services, make enquiries and engage with us, information is gathered about you. We may also collect information about you from other people and other parties, for

² Sensitive data: RMI may manage sensitive data from time to time as part of its investigation service. In doing so we undertake the management of such data due to legitimate business activities or the defence of legal claims

³ For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy, which is available on our website.

example, from company records offices, credit rating agencies and from sources where you have chosen to make your information publicly available, such as social media sites.

- When we collect information about you:
 - When you ask us to provide you with certain services. For example, Protect and Response services may require us to collect relevant familial relationship, location, asset and health information from you.
 - When you use our website and online services provided by us (including mobile applications) and visit our offices.
 - When you or others give us information verbally or in writing. This information may be on discussing services with us or if you make a complaint.
 - When you use our products or services we may gather details about who you, for example voice recording on hot line services, location on personal alarm locators
 - From information publicly available about you – for example in trade directories, online forums, websites, Facebook, Twitter, YouTube or other social media. When you make information about yourself publicly available on your social media accounts, and where it is appropriate for us to use it
 - From your online activities with third parties where you have given us your consent (for example, by consenting to our use of certain cookies or other location tracking technologies).
 - From credit reference agencies, credit registration agencies, fraud prevention agencies or public agencies such as property registration authorities, the Companies Registration Office or judgement registries.

Please note: If you apply for or are subscribing to an RMI service that includes another party (e.g. you and your partner's details being provided by you in relation to a service being provided by RMI to you), you should only give personal information about someone else (for example, a joint applicant or dependant) with their permission.

5. How we use your information

Whether we're using it to confirm your identity, to help in the processing of a product or service or to improve your experiences with us, your information is always handled with care and the principles outlined in this Data Privacy Notice are always applied.

We use your information:

To provide our products and services to you, and to fulfil our contract with you

- To provide our products and services to you and perform our contract with you, we use your information to:
 - Establish your subscription to our products and services.
 - Manage and administer your subscription account or other products and services that we or our partners may provide you with.
 - Contact you by post, phone, text message, email, social media, fax, directly or using other means, but not in a way contrary to your instructions to us or contrary to law.
 - Monitor and record our conversations when we speak on the telephone (for example, in providing our 24-Hour Response Service hotline; to check your instructions to us; to analyse, to assess and improve customer service; for training).
 - Manage and respond to a complaint or appeal.

To manage our business for our legitimate interests or in defence of claims

- To manage our business, we may use your information to:
 - Carry out asset tracing
 - Engage agencies to trace you (for example, where the address you have provided is no longer accurate and a client needs to provide you with legal documentation).
- Provide service information, to improve our service quality and for training purposes
 - We may gather information about your interactions with us – for example, the location of a ⁴PAL/ VAL you use, or where you consent, when you download one of our apps, we may gather location information from your mobile phone or other electronic device you may use to interact with us.
- Conduct marketing activities:
 - For example, post-project surveys and direct marketing (provided that you have not objected to us using your details in this way), and research, including customer surveys, analytics and related activities.

To run our business on a day to day basis including to:

- Carry out strategic planning and business product management.
- Compile and process your information for audit, statistical or research purposes (including, in some instances, making your data anonymous) in order to help us understand trends in our customer behaviour and to understand our risks better, including for providing management information, operational and data risk management.
- Protect our business, reputation, resources and equipment, manage network and information security (for example, developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services) and prevent and detect fraud, dishonesty and other crimes (for example, to prevent someone trying to steal your data), including using CCTV at our premises.
- Manage and administer our company's legal and compliance affairs, including complying with our obligations to compliance with regulatory guidance and voluntary codes of practice to which we have committed.
- Enable our company employees to share or access your information for internal administrative purposes, audit, prudential, statistical or research purposes (including making your data anonymous) to help us understand trends in customer behaviour, for helping us to understand our risks better and for the purposes set out in this Data Privacy Notice (but not for the purposes of direct marketing where you have objected to this).

⁴ PAL / VAL: Personal/ Vehicle Alarm Locator

To buy and/or sell assets of RMI Ltd:

- RMI Ltd may in the future wish to sell, transfer or merge part or all of its business or assets or to buy a new business or the assets of another business or enter into a merger with another business. If so, we may disclose your personal information under strict duties of confidentiality to a potential buyer, transferee, merger partner or seller and their advisers, so long as they agree to keep it confidential and to use it only to consider the possible transaction. If the transaction goes ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this Data Privacy Notice.

To comply with our legal and regulatory obligations

We need to use your information to comply with legal and regulatory obligations including:

- Complying with your information rights.
- Providing you with statutory and regulatory information.
- Establishing your identity and residence in order to comply with law and regulation concerning the prevention of fraud
- Conducting searches on the credit registers and other industry registers.
- Complying with binding requests from regulatory bodies
- Complying with court orders arising in civil or criminal proceedings.
- Performing a task carried out in the public interest.

Where you have given us permission (which you may withdraw at any time)

Where you have given us permission (which you can withdraw at any time) we may:

- Send electronic messages to you about product and service offers from our company and/or our selected and trusted partners.
- Share your data with third parties so that they may send you electronic messaging about their products and offers.
- Use cookies in accordance with our Cookie Policy.
- Use special categories of data, or sensitive data.
- Use your location data to provide contingency information to you or to provide contingency support
- Use information you have made public and combine with this with the activities outlined above.

When we ask for your consent, we will provide you with more information on how we will use your data in reliance on that consent, including in relation to third parties we would like your consent to share your data with.

6. Who we share your information with

We only share your information with a select number of individuals and companies, and only as necessary. Sharing can occur in the following circumstances and/or with the following persons:

- Your authorised representatives:
- These include your organisation (who are providing your data as part of a contingency service arrangement they have entered into with RMI), attorney (under a Power of Attorney) and any other party authorised by you to receive your personal data.
- Third parties we need to share your information with in order to establish agreed service offerings, such as PAL/VAL; other contingency service providers.

- We may request information relating to your health selected contingency support services (where knowing such information is required to support or safeguard you)
- We may disclose your information within our company, to our agents and other third parties for administration, regulatory, customer care and service purposes, and to investigate or prevent fraud.
- When you subscribe to one of our services.
- Companies that provide support services for the purposes of protecting our legitimate interests.
 - Your personal information remains protected when our service providers use it. We only permit service providers to use your information in accordance with our instructions, and we ensure that they have appropriate measures in place to protect your information.
 - Our service providers include operational contingency services, personal, physical asset and cyber protection services, IT and telecommunication service providers, software development contractors, document storage and destruction companies,
 - Custodians and providers of administration services, archiving services suppliers, tracing agencies, receivers, liquidators, examiners, official Assignee for Bankruptcy and equivalent in other jurisdictions, auditors and consultants, including legal advisors.

Statutory and regulatory bodies (including central and local government) and law enforcement authorities.

- These include the courts and those appointed by the courts, government departments, statutory and regulatory bodies in all jurisdictions where RMI operates including: The Data Protection Commission, An Garda Síochána/police authorities/enforcement agencies, NAMA and its agents or other parties designated by or agreed with NAMA or designated under the relevant legislation as well as fraud prevention agencies.

7. How long we hold your information

In principle, we will only hold your data for as long as we are providing you with a product or service, or where your data is part of an investigation project. On close of a product, service or project we will then delete your data through our information lifecycle management protocol, (where upon it is permanently deleted). Outside of the above principle, the length of time we hold your data depends on a number of factors, such as regulatory rules.

Those factors include:

- The regulatory rules contained in laws and regulations or set by authorities
- Whether you and us are in a legal or some other type of dispute with another person or each other.
- The type of data we hold about you.
- Whether you or a regulatory authority asks us to keep it for a valid reason.

8. Implications of not providing information

Where you are subscribing to a product or service provided by RMI, sharing information with us is in both your interest and ours.

We need your information in order to:

- Provide our products and services to you and fulfil our contract with you.
- Manage our business for our legitimate interests.

Of course, you can choose not to share information, but doing so may limit the services we are able to provide to you.

- We may not be able to provide you with certain products and services that you request
- We may not be able to continue to provide you with or renew existing products and services.
- We may not be able to assess your suitability for a product or service, or, where relevant, give you a recommendation to provide you with an RMI product or service.

9. The legal basis for using your information

We will use your data and share that data where:

- Its use is necessary in relation to a service or a contract that you have entered into or because you have asked for something to be done so you can enter into a contract with us.
- Its use is in accordance with our legitimate interests outlined in this notice.
- You have consented or explicitly consented to the using of your data (including special categories of data) in a specific way.
- Its use is necessary to protect your “vital interests”.
 - In exceptional circumstances we may use and/or disclose information (including special categories of data) we hold about you to identify, locate or protect you, for example, if it comes to our attention that you are in imminent physical danger and this information is requested by An Garda Síochána, police in other jurisdictions or your relative.
- Where you have made clearly sensitive categories of data about yourself public.
- Where the processing of special categories of data is necessary for the establishment, exercise of legitimate interests or defence of legal claims.
- Where authorised by law or regulation, we may undertake processing of special categories of data for a substantial public interest.
- Where the processing of criminal conviction data is authorised by EU or local law.

10. Processing your information outside the EEA

Your information is stored on secure systems within RMI's premises and with providers of secure information storage.

We may transfer or allow the transfer of information about you and your products and services with us to our service providers and other organisations outside the European Economic Area (EEA), but only if they agree to act solely on our instructions and protect your information to the same standard that applies in the EEA.

For example, we may provide you with a device or software that updates on your location status as you travel. Authorised third parties may operate or support these services. These external organisations may process and store your personal information abroad and may disclose it to foreign authorities to help them provide a service to you or in their fight against crime and terrorism.

Using companies to process your information outside the EEA.

Some of our service providers, for example providers of administration services, tracing agents and contractors are based outside of the EEA. Where we authorise the processing/ transfer of your personal information outside of the EEA, we require your personal information to be protected to at least Irish standards and include the following data protection transfer mechanisms:

- Adherence to the EU/US Privacy Shield. You can find more information on the EU/US Privacy Shield at www.privacyshield.gov including a list of all organisations that have signed up to the EU/US Privacy Shield framework.

11. How to exercise your information rights (including the right to object)

Providing and holding personal information comes with significant rights on your part and significant obligations on ours. You have several rights in relation to how we use your information. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise:

You have the right to:

- Find out if we use your information, to access your information and to receive copies of the information we have about you.
- Request that inaccurate information is corrected and incomplete information updated.
- Object to particular uses of your personal data where the legal basis for our use of your data is our legitimate business interests (for example, profiling we carry out for our legitimate business interests) or the performance of a task in the public interest. However, doing so may have an impact on the services and products we can / are willing to provide.
- Object to use of your personal data for direct marketing purposes. If you object to this use, we will stop using your data for direct marketing purposes.
- Have your data deleted or its use restricted – you have a right to this under certain circumstances. For example, where you withdraw consent you gave us previously and there is no other legal basis for us to retain it, or where you object to our use of your personal information for particular legitimate business interests.
- Obtain a transferable copy of certain data to which can be transferred to another provider, known as “the right to data portability”.
 - This right applies where personal information is being processed based on consent or for performance of a contract and the processing is carried out by automated means. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access. The right also permits the transfer of data directly to another provider where technically feasible. Therefore, depending on the technology involved, we may not be able to receive personal data transferred to us and we will not be responsible for the accuracy of same.
- Withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.

We are obliged to respond without undue delay. In most instances, we will respond within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons why. If you make your request

electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise.

You have the right to complain to the Data Protection Commission or another supervisory authority.

You can contact the Office of the Data Protection Commissioner at <https://www.dataprotection.ie/docs/Contact-us/b/11.html>

Telephone: +353 (0)761 104 800 or Lo Call Number 1890 252 231

Fax: +353 57 868 4757

E-mail: info@dataprotection.ie

Postal Address: Data Protection Commission, Canal House, Station Road, Portarlington, R32 AP23, Co. Laois.

12. How to contact us and/or our Data Protection Officer

If you have any questions about how your personal data is gathered, stored, shared or used, or if you wish to exercise any of your data rights, please contact our Data Protection Officer at:

Telephone: +353 (0)1 4038700

E-mail: info@rmi.ie; please use 'DPO' or 'Privacy' in the subject field

Postal Address: RMI Ltd, RMI House, 2055, Citywest Business Park, D24 X2XT, Dublin

13. Changes to this notice

We will update this Data Privacy Notice from time to time. Any changes will be communicated to you and made available on this page and, where appropriate, notified to you by SMS or e-mail.

Dated 20th May 2018