

REMOVALS INDUSTRY OMBUDSMAN SCHEME (RIOS) PRIVACY POLICY

Our Privacy Policy explains:

- What information we collect and how we collect it
- Why and how we use your information.
- How long we keep your information
- How we may share your information
- Your rights on the information we hold about you
- Security-How we keep your information safe
- Changes to this Privacy Policy
- How to Contact Us

Information We Collect

In order to provide our services and for the other purposes set out in Use of Information below, we will collect and process Personal Data from you. We may collect the following information:

- Personal information (for example, your name, email address, mailing address, phone numbers, and address)
- Sensitive Personal Data such as information about the reasons why you are seeking our services and information which is relevant to the concerns and interests you have raised.
- Financial Information, but only insofar as it is relevant to your complaint
- Feedback from you to enable us to monitor and improve our services

We collect your information from:

- The 'Making a Complaint' document that you provide to us, and any further information you provide whether by post or by email
- Telephone conversations, emails and written and verbal communications received from you
- Removers which are a party to your complaint

Your responsibility to inform us of changes

For us to comply with our duty to maintain up to date and accurate records, please keep us informed of any changes to your personal data.

Use of information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data:

- to perform our role as Mediator and/or Arbitrator in addressing your complaint and
- to comply with a legal obligation

The legal basis upon which we collect and process this information is that our service constitutes a 'Public Task'. As a provider of Alternative Dispute Resolution (ADR), for consumer clients of the Removal companies in membership of the scheme, we act to facilitate complaints resolution; this service is an alternative to litigation; or a prelude to litigation. In this context we are fulfilling a task in the public interest.

This may include processing Personal Data for the purposes of:

- Providing our services to you;
- Responding to your requests and inquiries;
- Improving our services, for example, requesting your participation in surveys, or other initiatives which help us to gather information used to develop and enhance our services. (The results of any such initiative will be anonymised.)
- Enabling us to provide, to maintain our own accounts and records and to support and manage our employees.

RIOS will not sell or give your information to others for commercial or any other purposes.

Sharing and Disclosure to Third Parties

We will disclose your Personal Data to

- those third party or parties which are the subject of your complaint
- any other third party for whom you request or authorise the disclosure of your personal details
- any other party as permitted by applicable law(s) and/or to comply with applicable law(s) (for example, to comply with a search warrant or court order).

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- other service providers who perform functions on our behalf. These may include:
- Professional advisors acting as processors or joint controllers including lawyers, bankers, auditors, insurers and professional consultants based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services;
- Legal and compliance regulators acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances such as but not limited to HM Revenue & Customs and Trading Standards Institute;
- Technology providers who assist in the development and management of our web properties;
- Hosting providers for the storage and transmission of your data.

Your Legal Rights

Access your data	you can ask for access to and a copy of your personal data and can check we are lawfully processing it
Correction	you can ask us to correct any incomplete or inaccurate personal data we hold about you
Deletion	you can ask us to delete or remove your personal data where: (a) there is no good reason for us continuing to process it; (b) you have successfully exercised your right to object (see below); (c) we may have processed your information unlawfully; or (d) we are required to erase your personal data to comply with local law
Request a transfer	you can request a transfer of your personal data which is held by us and which you provided for us to process to perform our purposes to you or a third party. We will provide your personal data in a structured, commonly used, machine readable format

We may not always be able to comply with a request to delete data for specific legal reasons, which will be notified to you at the time of your request.

You may seek to exercise any of these rights by sending a written request to:
The Data Controller, Removals Industry Ombudsman Scheme,
PO Box 1535, High Wycombe HP12 9EE

You have the right to make a complaint at any time to the ICO (www.ico.org.uk) about how we have dealt with your data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

How long will we keep your information?

Upon closing a case, our files are reviewed, and we will then keep only as much information as it reasonably required for us to discharge our professional, contractual and legal obligations.

Data destruction policy

All complaint files will be retained for a period of six months after the case is closed. All closed complaint files will be securely destroyed within six months of the end of our reporting period which ends on 30th June each year.

Other information

Invoicing and accounting information – 6 years

Information security

We are working to protect your personal information that we hold, its confidentiality, integrity and availability.

- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Staff and Consultants subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- We use a combination of technology and procedures to ensure that our paper and computer systems are protected, monitored and are recoverable.
- We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

Compliance and cooperation with regulatory authorities

We regularly review compliance with our Privacy Policy. If we receive formal written complaints, we will contact the person who made the complaint to follow up. We will work with the ICO to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

Changes

Our Privacy Policy may change from time to time. Our data collection and destruction policy is subject to ongoing review and may be amended to comply with future amendments to regulations and guidance.

We will not reduce your rights under this Privacy Policy without your explicit consent.

How to Contact Us

If you have any enquiries regarding your data or this policy or wish to exercise your rights, please contact:

The Data Manager, RIOS, PO Box 1535, High Wycombe, Bucks, HP12 9EE