



## **PRIVACY POLICY**

This Privacy Policy forms part of the Terms and Conditions of RKJOnline.

# PRIVACY POLICY

We are committed to responsible data management and subscribe to the principals of the data protection legislation in the United Kingdom.

We are committed to maintaining the privacy of our users and maintaining the security of any personal information received from them.

If you register for any of the Services you will be asked to provide basic personal information; this is contact info (name, address, phone, email). You may supply Title and Job title but this is not needed. No other sensitive data is requested.

The information provided by you is not available for sale or use by third party.

In terms of employees of which there are 2 – the 2 Directors – personal info is used for Government reporting e.g. PAYE and NI.

In terms of suppliers we use only generic business contact data i.e. no individual personal data.

## **Personal Information held about clients and employees of RKJ Consulting Ltd / RKJOnline:**

- **Is used fairly, lawfully and in a transparent manner**
- **Is used for limited, specifically stated purposes** i.e. client personal data is used to occasionally contact clients such as sending invoices or SEO reports or to reply to requests for website updates. Some personal data (name and address) is used to register the domain name that the client has requested be registered to them. This is done by our service provider, Fasthosts and is the mechanism for registering the domain at the public registry “Nominet” (the official registry for .UK domain names) and for non-UK registries such as ICANN (.com domains). Some data may be used for bios on social media – this is business information that the client gives consent to using and has the ability to update (e.g. they are an “admin” or “manager” of the social media account).
- **Is used in a way that is adequate, relevant and not excessive;** we do not provide personal data to Fasthosts/Nominet or to other UK/International 3<sup>rd</sup> party domain registrars that we do not HAVE to provide and we do not provide personal data to any other 3<sup>rd</sup> party without expressly gaining consent from our clients first. For example if a client requested a new plug-in for their website and this meant providing personal data, we would always seek consent first.
- **Is accurate and up to date;** we do request our clients keep us updated with (for example) change of address and where changes occur we update the relevant entries as soon as possible to ensure accuracy. This includes our own password protected customer database.
- **Is kept for no longer than is absolutely necessary;** client personal data is destroyed when a client leaves RKJOnline
- **Is handled according to people’s data protection rights**
- **Is kept safe and secure; we employ various levels of data protection** – from an encrypted password manager system to individual database password protection. Computers and mobile phones are password protected. Erasure of cookies, cache, browsing history etc. happens each time a browser is closed. Stand-alone backup drives are kept under lock and key at the premises which has an alarm system. Cloud backup is encrypted.
- **Is not transferred outside the [European Economic Area](#) without adequate protection;** we do not share client, employee or supplier data within the EU. We have Australian-based clients whose data is used for contact, for registering their domains and for social media bios (business data) – no other use.

In summary, we are diligent with and respectful of the personal data provided by our clients. We build strong relationships with our clients based on goodwill and have verbal contracts to provide the web services and products they ask us to provide.

The personal data requested by us and provided to us is data that is **necessary for us to fulfil the service that our clients have requested of us and paid for.**

Specifically:

- a) to develop a website at a specific domain
- b) provide email capability
- c) provide search engine optimisation
- d) provide social media platforms
- e) facilitate occasional contact with our clients

### **SSL Certification and encryption of data held and in transit**

RKJOnline makes every effort to keep personal data of our clients and employees secure.

With regard to “data held” and “data in transit” it’s important to reiterate what all clients are told when they employ our services with reference to SSL certification:

#### **Data in transit**

Websites designed by RKJOnline do not have SSL certification (are not “HTTPS” websites) and do not have encryption of data in transit. This is explained to the client before agreement to continue with website development and acceptance of these Terms and Conditions underlines the customer’s acceptance.

It is the responsibility of the customer to assess any risk, be mindful of data protection (and GDPR) laws and rules and to consider limiting data requested from website visitors.

For information, the data transmitted is:

- database content (website content); this is in the public domain;
- personal data such as (for example) name and email address from a website visitor using a contact form, and
- personal data such as (for example) name and address from a website visitor placing an order on an ecommerce site.

#### **Data held**

Any data stored by the (WordPress) website is held in a standard MySQL database; passwords held in this database are encrypted. No financial data is ever held or transmitted – all RKJOnline WooCommerce sites use a PayPal Gateway for payment processing.

To clarify, RKJOnline limits the personal data requested and held by customers websites and would not agree to developing a Contact Form that requested (for example) financial, health or other sensitive personal data.