

Privacy policy

This privacy policy gives you information about how RTP collects and uses your personal data when you visit our website at www.rtp.resources.com ("**Website**") and/or access our Platform.

Controller

QOLSTA Limited (trading as RTP) of 9 Perseverance Works, Kingsland Road, London, E2 8DD is the controller and responsible for your personal data (collectively referred to as "RTP", "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details below:

1. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

Depending on the circumstances, we may process your personal information:

- where it is necessary to perform a contract with you, including providing access to the Platform, administering your account, managing subscriptions and delivering our services;
- where it is necessary for our legitimate interests, including operating, maintaining, improving and securing the Platform, responding to enquiries, administering events and understanding how our services are used;
- where we are required to comply with a legal or regulatory obligation; and
- where you have provided your consent, including in relation to certain marketing communications, cookies and, where applicable, the recording of workshops, webinars or other events.

The table below sets out the personal information we collect, how we collect it and the legal basis on which we process it.

Action	Collection of personal data	Legal Basis
Visiting our Website	<u>We may collect:</u> Technical Data includes technical information necessary to enable you to access and use our Website and Platform, including information used to authenticate your account and maintain your login session. Usage Data includes information about how you interact with and use our Website and Platform. Where we collect analytics information about use of our Website, this is collected without the use of cookies. Aggregated Data: includes statistical information created from information about how users interact with and use our Platform, including information about participation in placements. Aggregated Data does not directly or indirectly identify you. Website Analytics Data includes information about how you interact with and use our Website, including visitor numbers, page views, popular content and sources of website traffic. We collect this	Legitimate interests; consent (for certain cookies)

information at this time using Ghost's cookie-free analytics to help us understand how our Website is being used and improve our services.

How we collect this information:

We collect this information automatically when you interact with our Website and Platform. We use essential cookies which are necessary for our Website and Platform to operate. These include cookies which enable you to log in to your account and remain logged in while using the Platform. As these cookies are necessary to provide the Website and Platform, we do not ask for your consent to use them.

We also use Ghost's cookie-free analytics to help us understand how our Website is used. Ghost's analytics do not use cookies or other persistent browser storage to identify visitors across different sessions, browsers or devices.

Contacting us about our Platform and the services we offer or subscribing to our Platform

We may collect:

Identity Data includes first name and last name, title.

Contact Data includes email address and telephone numbers.

How we collect this information:

We collect this information directly from you when you contact us, request information about the Platform or create an account.

Where access to the Platform is provided through an employer or other organisation, we may also receive your name and email address from that organisation for the purpose of creating and administering your account and providing access to the Platform.

Performance of a contract; legitimate interests

Live workshops, webinars, member events and other learning activities

We may collect:

Identity Data and Contact Data as well as attendance records, questions submitted, comments, contributions made during sessions and, where applicable, recordings including image and voice data.

How we collect this information:

We collect this information directly from you when you register for, attend or participate in a workshop, webinar, member event or other learning activity.

Where a workshop, webinar or event is recorded, we may also collect image, voice and participation data through the relevant event platform. Participants will be notified where recording takes place.

Performance of a contract; legitimate interests; consent where recording is required

Where you participate in an event we are hosting or attending, or when you register any

We may collect:

Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

How we collect this information:

We collect this information directly from you when you request information about RTP, register your interest in the Platform,

Consent or legitimate interests, as permitted by law

interest in our Platform complete a survey, attend an event hosted or attended by RTP, subscribe to our communications or otherwise interact with us.

PLEASE NOTE - You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us using the details above.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

2. HOW WE SHARE YOUR PERSONAL INFORMATION

We may share your personal information with:

- service providers who support the operation, hosting, maintenance and security of the Platform;
- payment service providers, where required to process subscription payments (although we do not take your financial details);
- organisations that have purchased access to the Platform on your behalf, but only to the limited extent that we confirm your having an account with us for payment purposes, unless we inform you in writing otherwise;
- professional advisers, including legal, accounting and insurance advisers;
- regulators, law enforcement agencies, courts or other authorities where required by law or to protect our legal rights; and
- prospective purchasers, investors or advisers in connection with a proposed merger, acquisition, investment or business reorganisation.

We require third parties who process personal information on our behalf to respect the security of your personal information and to process it in accordance with applicable data protection laws.

3. INTERNATIONAL TRANSFERS

We generally store and process personal information within the United Kingdom. However, some of our third-party service providers may process personal information outside the United Kingdom.

Where personal information is transferred outside the United Kingdom, we will ensure that appropriate safeguards are in place in accordance with applicable data protection laws. These safeguards may include the use of adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses or other lawful transfer mechanisms.

You may contact us if you would like further information about any international transfers of your personal information.

4. 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.

5. DATA RETENTION

We will only retain your personal information for as long as is reasonably necessary for the purposes for which it was collected, including for the purposes of providing the Platform and our services, complying with legal obligations, resolving disputes and enforcing our agreements.

Where you create an account or access the Platform, we will generally retain your account information and related records for as long as your account remains active and for a reasonable period thereafter.

Where you visit our Website, technical and usage information will be retained for as long as is reasonably necessary for analytics, security, performance monitoring and Website administration purposes.

Where your access to the Platform is provided through an organisation, we may retain information relating to your account after your access has ended where required for legal, regulatory, security or record-keeping purposes.

Once personal information is no longer required, we will securely delete, anonymise or otherwise dispose of it in accordance with our data retention practices and applicable law.

6. YOUR LEGAL RIGHTS

You have a number of rights in relation to your personal information, including the right to:

- access the personal information we hold about you;
- ask us to correct inaccurate or incomplete personal information;
- ask us to delete your personal information in certain circumstances;
- object to our use of your personal information in certain circumstances;
- ask us to restrict how we use your personal information in certain circumstances;
- receive a copy of certain personal information in a portable format; and
- withdraw your consent where we rely on your consent to process your personal information.

Not all rights apply in every situation and there may be circumstances where we are unable to comply with a request.

You will not usually have to pay a fee to exercise your rights. However, we may charge a reasonable fee, or refuse a request, where it is clearly unfounded, repetitive or excessive.

To protect your privacy and security, we may ask you to verify your identity before responding to a request.

We will respond to your request as soon as reasonably practicable and, in most cases, within one month.

If you wish to exercise any of your rights, please contact us using the details set out in this Privacy Policy.

7. COMPLAINTS

If you have any questions or concerns about how we use your personal information, please contact us first and we will do our best to help.

You also have the right to make a complaint to the Information Commissioner's Office ("**ICO**"), the UK's data protection regulator. Please see <https://ico.org.uk/make-a-complaint/>.

8. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We may update this Privacy Policy from time to time. The latest version will always be available on our Website.

Please let us know if your personal information changes during your relationship with us so that we can keep our records accurate and up to date.

9. THIRD-PARTY LINKS

Our Website and Platform may contain links to third-party websites, services or applications. We are not responsible for their privacy practices and encourage you to read their privacy policies before providing any personal information.