

GENERAL DATA PROTECTION REGULATION (GDPR)
ACCOUNTABILITY SCHEDULE AND PRIVACY NOTICE
FOR ROSAN & COMPANY LTD

DATA PROTECTION ACT 1998

The Act outlines 8 data protection principles of good information handling:

Personal information must be:

- Fairly and lawfully processed
- Processed for specific purposes
- Adequate, relevant and not excessive
- Accurate and, where necessary, kept up to date
- Not kept for longer than is necessary
- Processed in line with the rights of the individual
- Kept secure
- Not transferred to countries outside the European Economic Area unless the information is adequately protected.

The Act covers information that is held on computer regarding living individuals e.g. name, address, D.O.B, an identifying information including opinions about an individual that could identify them.

Rosan & Company Ltd is committed to protecting and respecting your privacy. This document outlines what personal information we hold, where it comes from and with it is shared with, along with any processing activity.

How do we collect information from you?

The information is provided to us by each individual when they register to bid or sell items at Rosan Reeves Auctions. Each bidder is encouraged to provide updated details as necessary.

What type of information is collected from you?

The personal information we hold for every bidder/vendor is as follows: name, contact details; which may include postal address, email address, telephone number(s).

Rosan & Company Ltd also has CCTV for crime prevention purposes, footage is held by the system for a period of 30 days, and is then automatically deleted. If footage is required as evidence by ourselves or the Police, it can be loaded onto USB and kept secure by the handler.

Why do we process your information?

In order to process personal data, we must have a valid lawful basis – most lawful basis require that processing is “necessary”, if we could reasonably achieve the same purpose without processing, there would be no lawful basis. The most lawful basis for Rosan & Company Ltd is “Legitimate Interests” – this includes commercial interests.

How is your information used?

The information submitted to us is added to our Client Database. The database is used to generate invoices/statements when items are bought/sold at our auctions. It is also used when we need to contact our clients by post, email or telephone, and may be used for mailshots.

CCTV footage is accessed only when necessary, for example to identify individuals in an incident, and /or to ascertain a timeline/chain of events.

Who do we share your information with?

We do not actively seek to share the personal data we hold.

Selected CCTV footage may be shared with the Police following an incident, but not as general viewing.

What rights do you have?

Individuals have the right:

- *To be informed* - Read this document – accountability Schedule and Privacy Notice
- *Access your data* – individuals have the right under Data Protection act to get a copy of the information held about them on a computer, and in some manual filing systems – please make a written request, we endeavour to respond promptly, but certainly within 30 days. We may ask for further information that we reasonably require in order to find the information and check the identity of the individual making the request.
- *To rectification* – this means to update/correct details – please update your contact details with us as necessary.
- *To erasure* – this means to remove – please write to us if you wish to remove your details, please bear in mind that you will be unable to buy/sell items if you remove your details.
- *Restrict processing* – the processing of data includes obtaining, disclosing, recording, holding, using, erasing, destroying.
- *To complain to the Information Commissioners Office (ICO) if you think there is a problem with the way we handle your data.* – Complaints can be made to the ICO, details can be found online.

Data Breach procedures

We make every effort to protect the data we hold, in line with legal requirements, but in the event of a data breach it is our responsibility to inform the ICO, and individuals concerned. Rosan & Company Ltd is registered with the ICO.