



GDPR And Privacy Policy

May 2018

How we use your information

This privacy notice tells you what to expect when Reminova collects personal information. It applies to information we collect about:

Visitors to our websites

When someone visits www.Reminova.com we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site and to find out if we can improve the user experience on the microsite. This information is only processed in a way which does not identify anyone. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Visitors to our ShareIn hosted microsite

When someone visits reminova.sharein.com they are entering an FCA compliant website of ShareIn Ltd a company registered with, and authorised by the UK Financial Conduct Authority. From 25th May 2018 the Sharein- Reminova microsite is fully GDPR compliant. People who register on the microsite will have some of their data stored on the ShareIn site and this is accessible to shareIn and their agents and key Reminova employees and agents. This data is used for the purposes of assessing their suitability to invest in Reminova, and for FCA compliance record keeping.

Sharein privacy policy is available [here](#)

Use of cookies by Reminova

Our website asks all visitors if they are willing to accept the use of cookies. Our site uses cookies to distinguish you from other users of the site. And improves the user experience when browsing our website. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Security and performance

Reminova uses a third party service to help maintain the security and performance of Reminova website. To deliver this service it processes the IP addresses of visitors to Reminova website.



Website Publishing and Hosting

We use a third party service, Joomla.org, to publish our website. Our website is hosted at siteground.com. We use a standard joomla service and siteground service to collect anonymous information about users' activity on our site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

For more information on siteground's privacy policy read [here](#).

For more information on joomla's privacy policy read [here](#).

Search engine

Our website does not have a search engine currently. IF we implement one in the future we aim to ensure search queries and results are only logged anonymously for the purpose of helping us improve our website and search functionality. No user-specific data will be collected by either Reminova or any third party.

Storage of Your Data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers who are engaged in the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Shareholder Communications and E-newsletters

We use a third party provider, Mailchimp, to deliver our shareholder communications and supporter e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. These are linked to Google Analytics, to allow us to collect standard internet log information and details of your behaviour patterns. We do this to find out what information is of most interest to shareholders and supporters and to see the number of visitors to the various parts of the website and microsites.

For more information, please see Mailchimp's GDPR [guideline](#).

Shareholder Database



We collect information about the individuals who express interest in becoming a shareholder in Reminova Ltd as part of an application process and to comply with Know-Your-Client (KYC) and anti-money laundering (AML) legal requirements. We may transfer some of the data supplied to carry out third party identification services in some cases. Any company we use to do this is a data processor for Reminova and only processes personal information in line with our instructions.

We keep all personal information about shareholders and applicants on a secure database with restricted access to only those employees or individuals who need the information to enable Reminova to keep accurate and up to date information about our shareholders, and comply with KYC and AML laws.

Some of the shareholder personal data is provided to a company that provides Company Secretarial Services to Reminova called MBM Secretarial Services Limited (No. SC156630) a company controlled by Reminova's legal advisors MBM Commercial LLP, so that they can manage and update the Company's official shareholder register which resides at Company's House, and to issue electronic share certificates as part of this process. This company is a data processor for Reminova and only processes personal information in line with our instructions.

Some of the shareholder information is inputted to Mailchimp so that we can communicate with you by email. Please see the earlier section on Shareholder Communications.

People who use our LiveChat service

We use a third party provider, Drift, to supply and support our LiveChat service, which we use to handle customer enquiries in real time.

If you use the LiveChat service we will collect your IP address and location and your name(optional), email address (optional) and the contents of your LiveChat session. This information will be retained potentially indefinitely by ShareIn Ltd as part of their FCA compliance requirements, related to the fact that from our website and the ShareIn microsite we sometimes are raising investment into our Company, and what we say to you could be considered an inducement to invest and therefore a regulated activity that requires a permanent record be kept for compliance purposes.

You can request a transcript of your LiveChat session if you provide your email address at the start of your session. From 25th May 2018 you will be able to request that your Drift session is deleted from Drift.

For more information, on Drift's use of information please read [this](#)

People who contact us via social media

We currently do not use a third party provider to manage our social media interactions.

Therefore if you send us a private or direct message via social media the message will be stored in a Reminova email account indefinitely. Reminova staff try to regularly review these and respond with an email to you, but this is not always possible. From May 25th 2018 we will implement a policy to delete these messages after they are 24 months old.



We plan to shorten the time we hold these emails in the future. Your message and email address will not be shared with any other organisations.

People who call us by telephone

When you call Reminova's helpline we collect Calling Line Identification (CLI) information. We use this information to help improve efficiency and effectiveness.

People who email us

We use a third part service from Google Inc. to provide and store our emails. All email from us uses Google's HTTPS encrypted connections and emails are encrypted as they move around Google's servers and from one data center to another. If your email service does not support encryption, you should be aware that any emails you send or receive may not be protected in transit.

We also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and investigate. Depending on the nature of the complaint we may have to pass the information to ShareIn as part of our activities under their FCA authorisation.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

When we take enforcement action against someone, we may publish the identity of the defendant in our Annual Report or elsewhere. Usually we do not, identify any complainants unless the details have already been made public.



Data Protection Act 1998 and Reporting Breaches

Many businesses are required by law to register with the Information Commissioner. Reminova is registered with the Information Commissioner. We may be required by law to report any security breaches involving personal data the Information Commissioner.

In reporting a breach we would have to pass on personal information to the Information Commissioner, so that they can make decisions about the action they might ask us to take. We will retain personal information only for as long as necessary to carry out these reporting duties.

Job applicants, current and former Reminova employees

Reminova is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at info@Reminova.com.

What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for or other roles we think you might be also interested in.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

Application stage

If you use our online application system, this will be collected by a data processor on our behalf (please see below).



We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.

You may also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

Shortlisting

Our hiring managers shortlist applications for interview. They will have access to all the personal information you provide.

Assessments

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by Reminova.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of eighteen (18) months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

Conditional offer

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies, and electronic copies prior to that on the basis of you providing originals at a later date.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- You will be asked to complete a criminal records declaration to declare any unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We may also ask you to complete a questionnaire about your health. This is to establish your fitness to work. This is done through a data processor (please see below).



If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- Passport details – so we can book travel for you as part of your work when needed
- Airline membership schemes – so you can benefit from these as part of your work
- Driver license - so we can book hire cars for you as part of your work when needed
- Allergies – so we can try to prevent accidental exposure to anything harmful to you
- Other email addresses of yours – so we can contact you by a non company email if we have a problem with our email services
- Preferences - so we can try and get stuff just right and make your working life better and easier

Post start date

Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest, or if they are active within a political party. If you complete a declaration, the information will be held on your personnel file.

Payroll Services

If you are employed by Reminova, relevant details about you will be provided to MVN Services who provide payroll services to Reminova. This will include your name, your p45, and the details on it. Your bank details, address, date of birth, National Insurance Number and salary.

Pension

Likewise, your details will be provided to NEST who are the administrators of the our Pension Scheme, of which Reminova is a member organisation. You will be auto-enrolled into the pension scheme and details provided to NEST will be your name, date of birth, National Insurance number and salary. Your bank details will not be passed to NEST at this time.

Health Management

If we make you a conditional offer, we may ask that you complete a questionnaire which will help to determine if you are fit to undertake the work that you have been offered, or advise us if any adjustments are needed to the work environment or systems so that you may work effectively.

We will send you a link to the questionnaire which will take you to Health Management's website. The information you provide will be held by Health Management who will provide us with a fit to work certificate or a report with recommendations. You are able to request to see the report before it is sent to us. If you decline for us to see it, then this could



affect your job offer. If an occupational health assessment is required, this is likely to be carried out by Health Management.

Recruitment Firms

For some vacancies, we sometimes advertise through recruitment companies online or in person. They will collect the application information and might ask you to complete a work preference questionnaire which is used to assess your suitability for the role you have applied for, the results of which are assessed by recruiters. We will endeavour to make sure that all recruitment firms we work with going forward are GDPR compliant.

How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your personal information, employment reviews, disciplinary matters, absences from work, records of any security checks and references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 12 months from the closure of the recruitment process.

Information generated throughout the assessment process, for example interview notes, is retained by us for 12 months following of the recruitment process.

How we make decisions about recruitment?

Final recruitment decisions are made by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account.

Any test performance is assessed by the recruitment team.

You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing 12info@Reminova.com.

Secondments

We also offer opportunities for people to come and work with us on a secondment basis. We accept applications from individuals or from organisations who think they could benefit from their staff working with us.

Applications are sent directly to Reminova. Once we have considered your application, if we are interested in speaking to you further, we'll contact you using the details you provided.



We might ask you to provide more information about your skills and experience or invite you to an interview.

If we do not have any suitable work at the time, we'll let you know but we might ask you if you would like us to retain your application so that we can proactively contact you about possible opportunities in the future. If you say yes, we will keep your application for 12 months.

Your rights

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you.

Complaints or queries

REMINOVA tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of REMINOVA's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

Access to personal information

REMINOVA tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Reminova for any personal information we may hold you need to put the request in writing addressing it to "Information Governance" The Data Controller and emailing info@reminova.com, or writing to the address provided at the end of this document.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.



If we do hold information about you, you can ask us to correct any mistakes by, and we will update our records (if we agree it is a mistake) and send you a copy of the updated record.

Disclosure of personal information

In many circumstances we will not disclose personal data without consent. However when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

We will be continuously reviewing additional information on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 16th May 2018.

How to contact us

If you want to request information about our privacy policy you can [email us](#) or write to:

Information Governance
The Data Controller
Reminova Ltd
Inveralmond Business Centre
3 Auld Bond Road
Perth
PH1 3FX