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## GDPR PRIVACY NOTICE

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### 1. Use of personal information

RG Insolvency Limited (RG Insolvency) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone we deal with and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

We process personal information to enable us to carry out our work as insolvency practitioners which includes processing data that was held by companies/individuals before our appointment together with data collected during an insolvency procedure or a fixed charge receivership. Our legal obligation to process personal data arises from work we are required to carry out under insolvency and other related legislation.

Insolvency practitioners are Data Controllers of personal data in so far as defined by data protection legislation. RG Insolvency will act as a Data Processor on their instructions about personal data in relation to an insolvency procedure or fixed charge receivership.

Personal data will be kept secure and processed only for matters relating to the insolvency procedure being dealt with.

### 2. Information About Us

RG Insolvency Limited, a limited company registered in England under company number 10957932.

Registered address: 2nd Floor, Hygeia House, 66 College Road, Harrow, England, HA1 1BE

Address: Devonshire House, Manor Way, Borehamwood, Hertfordshire, WD6 1QQ

VAT number: 280 0901 29

Data Protection Officer: Avner Radomsky

Email address: [info@rginsolvency.com](mailto:info@rginsolvency.com)

Telephone number: 020 3603 7871

Postal Address: Devonshire House, Manor Way, Borehamwood, Hertfordshire, WD6 1QQ

Avner Radomsky is a Licensed Insolvency Practitioner regulated by the Insolvency Practitioners Association and a member of the Association of Business Recovery Professionals, R3.

### 3. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 4. What is Personal Data?

Personal data is defined by the UK General Data Protection Regulation (the "GDPR") and the Data Protection Act 2018 as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

### 5. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate

or incomplete. Please contact us using the details in Part 12 to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF or on their helpline number: 0303 123 1113.

## 6. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone/mobile number;
- Business name;
- Job title;
- Profession;
- Payment information / Bank details;
- Information about your preferences and interests;
- Amount owed / amount due;
- Shareholding;
- Date of birth;
- National Insurance Number;
- Employment details, including pay rates and arrears and holiday entitlement

Your personal data may be obtained from the following third parties:

- Company Directors
- Accountants
- Debtors

## 7. **How Do You Use My Personal Data?**

In addition to processing personal information to enable us to carry out our work as insolvency practitioners, your personal data may be used for one of the following purposes:

- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email, calls and/or post
- Requesting information from you by email, calls and/or post

The majority of our communications will be permitted and/or required by law, largely under the provisions of The Insolvency Act 1986 (as amended) and the Insolvency (England and Wales) Rules 2016.

In certain circumstances, individuals are under a contractual or statutory obligation to provide their personal data. This includes Directors and/or individuals who instruct us.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended), and you will always have the opportunity to opt-out.

## 8. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Information relating to any aspect of a formal insolvency process for which we are instructed will be kept for the duration of the insolvency process and up to 6 years thereafter as required by law;

## 9. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

## 10. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, including obligations to our regulatory body, a court order, or the instructions of a government authority.

We may sometimes contract with third parties to supply services to you on our behalf. These may include independent agents, solicitors, accountants, joint office-holders and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

All of the third parties we use are based in the UK.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

In some circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details;

Email address: [info@rginsolevncy.com](mailto:info@rginsolevncy.com)

Telephone number: 020 3603 7871.

Postal Address: Devonshire House, Manor Way, Borehamwood, Hertfordshire, WD6 1QQ.

13. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on the same website link.