

PRIVACY POLICY

Radiation Consultancy Services Ltd (RCSL) Privacy Policy

RCSL is dedicated to protecting the confidentiality and privacy of information entrusted to us. As part of this fundamental obligation, RCSL is committed to the appropriate protection and use of personal information, collected through our websites, telephone calls, emails and other mediums. We neither desire nor need to collect or process any personal data from our clients or their customers, but we recognise that at times this information may inadvertently be provided to us.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure you are still happy with any amendments we have made. This policy is effective from 1st October 2025.

Client Portal Users: If you are a user of our Client Portal, this policy applies to you. The portal involves additional data processing activities described in Section E below. For complete details about portal data processing, please also refer to our **Client Portal Terms & Conditions** and **Data Processing Agreement**.

A) DATA PROTECTION PRINCIPLES

Under General Data Protection Regulations (GDPR), all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA COLLECTED AND HELD

We may collect the following information:

- Name
- Demographic information such as address and postcode
- Contact information including email address

The data we collect from our website is from Google Analytics which tracks and reports our website's traffic.

Client Portal users: If you use our Client Portal, additional personal data may be processed depending on what documents and information your organisation uploads. This may include professional qualifications, training records, compliance documentation, and (where required for radiation protection compliance) radiation exposure records and health surveillance data. You control what data is uploaded to the Portal.

C) COLLECTING YOUR DATA

You may provide several pieces of data to us directly during the initial contact period and subsequent correspondence.

In some cases, we will collect data about you from third parties, such as our customers, group email lists and referrals.

Personal data, other than business addresses and contacts are not requested at any time by RCSL and will, where possible be deleted upon receipt. All other data is kept in files and within the Company's IT system.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. We process your data in order to comply with our legitimate interests we have with you.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Business contact details for communication and client management purposes	Our legitimate interests
Maintaining comprehensive up to date business records about you to ensure, amongst other things, effective correspondence can be achieved	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Track audience, acquisition and behaviour overviews to improve our website function	Our legitimate interests

E) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for administration and servicing our customers may have access to your details to allow contact to be made and appointments booked. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

CLIENT PORTAL USERS - IMPORTANT:

Third-Party Service Providers: Our Client Portal is built on third-party infrastructure. We use the following sub-processors to provide the portal service:

- **Softr** (United States/EU) - Portal platform and hosting
SOC 2 Type II certified
Provides: Application infrastructure, security, and data hosting
- **Airtable** (United States) - Data storage and management
SOC 2 Type II certified
Provides: Database services for storing portal documents and records

Your Role: If you use the Client Portal,

- Your organisation is the Data Controller for all personal data uploaded to the Portal
- RCS acts as Data Processor, processing data only on your instructions
- You are responsible for ensuring you have the right to share personal data with RCS via the Portal
- Full details are in our Data Processing Agreement

General Business Operations: For business operations outside the Client Portal, we do not share your data with third parties.

International Data Transfers:

- **Client Portal:** Data may be transferred outside the UK and European Economic Area to the United States. These transfers are protected by Standard Contractual Clauses approved by the ICO/European Commission and reliance on our sub-processors' SOC 2 Type II compliance frameworks.
- **General Operations:** We do not transfer data outside the UK or European Economic Area for general business operations.

F) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Client Portal Security: The Portal infrastructure includes encryption in transit (HTTPS/TLS), encryption at rest, secure authentication, regular security updates, firewall protection, activity logging, and automated threat detection. These security measures are provided through our SOC 2 Type II certified platform providers.

Please be aware that the RCSL website may contain links to other sites that are not covered by this Privacy Policy. We encourage users to review the Privacy Policy of each website visited before disclosing any personal information.

G) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your contract with us. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Statutory Retention Period
Name, Address, contact details, account transactions to satisfy HMRC	6 years from the date of your last transaction

Client Portal: Upon termination of portal access, we will delete or return your data within 90 days (or 30 days if you request return). Data in system backups is retained for 30 days before secure deletion. See our Data Processing Agreement for full details.

H) YOUR RIGHTS

Under the UK GDPR, you have the following rights:

- Right of access – you have the right to request a copy of the personal data we hold about you
- Right of rectification – you have the right to request correction of inaccurate personal data
- Right to erasure – you have the right to request deletion of your personal data in certain circumstances

- Right to restrict processing – you have the right to request restriction of processing in certain circumstances
- Right to data portability – you have the right to receive your personal data in a structured format
- Right to object – you have the right to object to processing based on legitimate interests

To exercise any of these rights, please contact us at the details provided in Section K below.

Client Portal users: Data subject requests should be directed to your organisation (the Data Controller), not to RCS. Your organisation is responsible for responding to such requests. RCS will assist as needed in accordance with the Data Processing Agreement.

I) CONSENT

Where you have provided consent to use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

J) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

K) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is: Niall Monaghan

Address: Ash House Business Centre, 8 Second Cross Rd, Twickenham TW2 5RF, UK

Related Documents:

- Client Portal Terms & Conditions (includes service continuity information)
- Data Processing Agreement (for portal users - available on request)

Version: 3.0

Effective Date: 1st October 2025

Last Updated: October 2025