

## Reality Solutions Data and Privacy Policy

### Reality Solutions Limited

Reality Solutions Limited is an IT and Business Software Solution provider, providing IT software, hardware, business solutions and support service to business within the UK. When we refer to “we” or “our” within this policy we are referring to Reality Solutions Limited.

### Policy Coverage

This privacy policy only applies to how Reality Solutions deals with your personal and business data. This policy does not apply to any other company or to any other companies' website even if you access these through Reality Solutions. If you disclose your personal or business information to any other parties, your data will be dealt with according to their data and privacy policy.

### Personal and Business Data

‘Personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. Personal identifiers to constitute personal data can include name, identification number, location data or online identifier, contact information and addresses.

‘Business Data’ meaning any information relating to a business, relating to any information to an identifiable business and information in relation the people, business rules, operations of a business.

### Six Lawful Basis for processing data

- Consent – The individual has given clear consent for you to process their personal data for a specific purpose.
- Contract – the processing of data is necessary due to the contractual terms of the relationship between you and the individual or business or because they have asked you to take specific steps before entering a contract.
- Legal Obligation – the processing of data is necessary to comply with a common law or statutory obligation
- Vital Interests – The processing of data is necessary to protect someone’s life.
- Public Task – The processing of data is necessary ‘in the exercise of official authority’. This covers public functions and powers that are set out in law; or to perform a specific task in the public interest that is set out in law
- Legitimate Interest – The process of data is necessary for your legitimate interest or the interests of third parties. They can include commercial interests, individual interests or broader social benefits. Can be processed unless there is good reason to protect the individual personal data which overrides those legitimate interests.

Source: <https://ico.org.uk/>

The above definitions of the six lawful basis’s for processing data have been taken from the ICO website and can be found on the ICO Website [www.ico.org](http://www.ico.org)

Reality Solutions understands different lawful basis's will be used dependent on the purpose of the processing of data and the relationship with the individual or organisation. Reality Solutions will determine the lawful basis before begin the processing of data.

#### Consent Assessment

Reality Solutions has carried out a Consent Assessment as advised by the ICO. Based upon this assessment it is deemed the data will be processed after Reality Solutions has been given clear and genuine consent. Positive opt-in will be acquired when contacting customers or individuals through direct marketing channels.

Per the ICO guidance Reality Solutions can confirm:

#### Asking for consent:

- We have checked that consent is the most appropriate lawful basis for processing.
- We have made the request for consent prominent and separate from our terms and conditions.
- We ask people to positively opt in.
- We don't use pre-ticked boxes or any other type of default consent.
- We use clear, plain language that is easy to understand.
- We specify why we want the data and what we're going to do with it.
- We give separate distinct ('granular') options to consent separately to different purposes and types of processing.
- We name our organisation and any third party controllers who will be relying on the consent.
- We tell individuals they can withdraw their consent.
- We ensure that individuals can refuse to consent without detriment.
- We avoid making consent a precondition of a service.
- If we offer online services directly to children, we only seek consent if we have age-verification measures (and parental-consent measures for younger children) in place.

#### Recording consent:

- We keep a record of when and how we got consent from the individual.
- We keep a record of exactly what they were told at the time.

#### Managing consent:

- We regularly review consents to check that the relationship, the processing and the purposes have not changed.
- We have processes in place to refresh consent at appropriate intervals, including any parental consents.
- We consider using privacy dashboards or other preference-management tools as a matter of good practice.
- We make it easy for individuals to withdraw their consent at any time, and publicise how to do so.
- We act on withdrawals of consent as soon as we can.
- We don't penalise individuals who wish to withdraw consent.

### Contract Assessment

Reality Solutions has carried out a Contract Assessment as advised by the ICO. Based upon this assessment Reality Solutions only carry out the processing of any Customer Personal Data on the Customer's or individual's instructions or Reality Solutions contractual obligations which is dependent on the relationship and agreement with the individual. The individual or customer should acknowledge that Reality Solutions will be acting as a "Data Processor" rather than as a "Data Controller", in respect of all data processing activities which Reality Solutions carry out under the contractual obligations.

### Legitimate Interest Assessment (LIA)

Reality Solutions has carried out a Legitimate Interest assessment as advised by the ICO. Based upon this assessment it is deemed that the rights and freedom of the data subjects would not be overridden in our processing of personal data. It is deemed any processing of data will be limited to business matters and therefore the risk of any personal compromise is unlikely. It is also deemed that marketing and sales is necessary in the context of following up visitors who have accessed the Reality Solutions website in order to better serve visitors and generate business sales.

Per the ICO guidance, Reality Solutions can confirm:

- We have checked that legitimate interests is the most appropriate basis.
- We understand our responsibility to protect the individual's interests.
- We have conducted a legitimate interests' assessment (LIA) and kept a record of it, to ensure that we can justify our decision.
- We have identified the relevant legitimate interests.
- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.
- We have done a balancing test, and are confident that the individual's interests do not override those legitimate interests.
- We only use individuals' data in ways they would reasonably expect, unless we have a very good reason.
- We are not using people's data in ways they would find intrusive or which could cause them harm, unless we have a very good reason.
- If we process children's data, we take extra care to make sure we protect their interests.
- We have considered safeguards to reduce the impact where possible.
- We have considered whether we can offer an opt out.
- If our LIA identifies a significant privacy impact, we have considered whether we also need to conduct a DPIA.
- We keep our LIA under review, and repeat it if circumstances change.
- We include information about our legitimate interests in our privacy information.

**How we procure data**

At Reality Solutions we procure data in variety of different ways and from a number of sources. Collected through the lawful basis's of "legitimate interest" "consent" and "contract" based on the type of data collected. The following ways are in which we collect data:

Business Data and personal data, with the view of being transparent to all individuals and customers Reality Solutions collects data via the following channels:

- **Primary Research:** Reality Solutions has an in-house sales teams who gather data relating to business from publicly available information, using search engines and online research tools.
- **Secondary Research:** Reality Solutions has an in-house sales and accounts team who gather data relating to business from publicly available sources of data such as companies house.
- **Third Parties:** Reality Solutions uses third party software to obtain information regarding website visitors. These third party data vendors have been checked for GDPR Compliance, to ensure compliance and validity of data.
- **Consent from individual or customer:** Consent has been given through such channels as contact forms, online clear opt-ins, clear instruction and specific statements of consent.
- **Purchase:** Reality Solutions from time to time purchase data through third party vendors with key segmentation criteria to ensure business data is obtained under "LIA". These third party data vendors have been checked for GDPR Compliance, to ensure compliance and validity of data.

**Sharing Data**

We may share your business and personal data with other parts of Reality Solutions to enable them to conduct data processing. This will only occur if the data is required, in regards to a contractual obligation with the customer. Providing it is required in order to complete an instruction given by the customer or individual.

**Data Storage and Retention**

The data held at Reality Solutions processed and stored within the UK within a secure environment. Internal software and security measures have been implemented and are consistently monitored in order to keep up to date with the data protection act and GDPR compliance regulations.

Reality Solutions has a cycle of cleansing and refreshing data, all invalid data is securely purged periodically throughout a 12-month period.

**Right to be informed**

Individuals and customers have the right to be informed about the collection and processing of their data. Reality Solutions will provide “privacy information” to individuals and customers. We provide “privacy information” in variety of way these include upon request, at the time of data collection. If collected by a third party or secondary source, if we plan to communicate with the individual, at the latest, when the first communication takes places.

**Right of access**

All individuals and customers have the right to access their personal and business data. Under GDPR regulations allowing individuals to access their personal data is so that the individuals are aware or and can verify the lawfulness or the processing of data. Upon request and complying with GDPR regulations Reality Solutions will provide this information free of charge and provided without delay and at the latest within one month of receipt of the request.

**Right to rectification**

Individual and customers have the right to rectify any inaccurate personal data with Reality Solutions. These rectifications can be made through requests, verbally or in writing. Upon request Reality Solutions will amend the personal data without delay and at the latest within one month of the request. Confirmation of the amendments to the personal data will be given to individual or customer once these changes have been successful.

**Right to object**

Under GDPR Regulations and compliance all individuals and customers have the right to object based on Legitimate Interest and/or from direct marketing communications from Reality Solutions. This request can be made verbally or in writing to Reality Solutions. Upon this request Reality Solutions will respond with confirmation and provide necessary information regarding the termination of the processing of the personal data. All Marketing communications will be stopped and any data processing under “LIA” will be terminated. Clear options will be available on all Reality Solutions direct marketing communication to object to comply with GDPR regulations.

**Right to erase “the right to be forgotten”**

It is important to understand the difference between the right to object and the right to erase. All requests are to be given to Reality Solutions in writing, upon receipt of this request Reality Solutions will remove any data we hold about the customer or individual from all software, and data storage locations at Reality Solutions.

**Right to restriction**

Individual and customers have the right to request the restriction or suppression of their personal or business data with Reality Solutions. These restrictions can be made through requests, verbally or in writing. Upon request Reality Solutions will stop using the personal data without delay. Please note when processing data is restricted Reality Solutions is permitted to store the data however not use it.

Should you wish to exercise any of the above rights and make a request, please make your request in writing to:

By emailing:

[info@realitysolutions.co.uk](mailto:info@realitysolutions.co.uk)

Or by writing to:

Data Compliance Representative, Reality Solutions Limited, Unit 1 Global Business Park,  
Hamburg Road, Hull. HU7 0AE

All requests as explained within each section will be acted upon without delay, and at the latest within one month of the request. Please note that this applies to the processing of personally identifiable data, not that of the business data which does not fall under the remit of GDPR.

For any questions relating to this policy, please contact [info@realitysolutions.co.uk](mailto:info@realitysolutions.co.uk)