RSL Group Privacy Notice

RSL Group Holdings Limited, a company within the RSL Group of companies ("we", "us"), is committed to protecting your privacy. This Privacy Notice ("Notice") sets out our data processing practices and your rights regarding how we use and collect your personal information (including through our websites).

This Notice applies to RSL Group Holdings Limited, and its subsidiary companies, which include RSL Awards Limited, Rockschool Limited, Rockschool London Limited, RSL India, RSL China, RSL Spain and Music Teacher Limited. Collectively, these companies are referred to as the "RSL Group".

The provision of your personal information to us is voluntary. However, without providing us with your personal information, your use of our services or your interaction with us may be impaired. For example, you will be unable to take an examination or receive a qualification.

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1. How we collect personal information about you

We collect personal information about you in the following ways:

a. **When you give it to us directly:** For example, personal information that you give to us when you communicate with us by email, phone, or letter.

b. **When we obtain it indirectly:** For example, your personal information will be shared with us by training/learning providers after you enrol for a course in relation to which we provide the relevant qualification or schedule an exam. If you are based outside of the UK, your personal information may also be submitted to us by RSL representatives in your country for the purposes of scheduling exams.

c. **When it is available publicly:** Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services, we may access information from those accounts or services.

d. **When you visit our websites:** When you visit an RSL Group website, we automatically collect the following types of personal information:

* Technical information, including the internet protocol (IP) address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions, and operating systems and platforms.
* Information about your visit to the websites, including the uniform resource locator (URL) clickstream to, through, and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks), and methods used to browse away from the page.

We collect and use your personal information by using cookies on our websites - please see our Cookie Notice for more information. In general, we may combine your personal information from these different sources for the purposes set out in this Notice.

2. What personal information do we use?

We may collect, store, and otherwise process the following kinds of personal information:

- your name and contact details, including postal address, telephone number, and email address;
- your date of birth and gender;
- your financial information, such as bank details and/or credit/debit card details;
- information about your computer/mobile device and your visits to and use of our websites, including, for example, your IP address and geographical location;
- unique candidate identifiers/unique learner numbers;
- details of your qualifications/experience;
- and/or any other personal information which we obtain as per paragraph 1.

Do we process special categories of data?

The UK General Data Protection Regulation ("UK GDPR") recognises certain categories of personal information as sensitive and therefore requiring more protection, for example, information about your health, ethnicity, and religious beliefs. In certain situations, RSL may collect and/or use these special categories of data (for example, information on candidates' medical conditions so that we can make arrangements for reasonable adjustments and/or special considerations). We will only process these special categories of data if there is a valid reason for doing so and where the UK GDPR allows us to do so.

3. How and why will we use your personal information?

Your personal information, however provided to us, will be used for the purposes specified in this Notice. In particular, we may use your personal information:

a. to register you as a candidate and allow you to sit examinations;

b. for examination administration purposes;

c. to conduct examinations and assessments;

d. to issue examination results and certificates;

e. to carry out any reviews or appeals;

f. to facilitate your purchase of books and materials;

g. to register and publish your profile as a teacher;

h. to otherwise provide you with services, products, or information you have requested;

i. to communicate as necessary with training/learning providers;

j. to provide further information about our work, services, or activities (where necessary, only where you have provided your consent to receive such information);

k. to answer your questions/requests and communicate with you in general;

l. to manage relationships with our partners and service providers;

m. to analyse and improve our work, services, activities, products, or information (including our websites), or for our internal records;

n. to keep our facilities safe and secure;

o. to run/administer the activities of the RSL Group, including our websites, and ensure that content is presented in the most effective manner for you and for your device;

p. to audit and/or administer our accounts;

q. to satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/or law enforcement bodies with whom we may work (for example, requirements relating to the payment of tax or anti-money laundering);

r. for the prevention of fraud or misuse of services;

s. for the establishment, defence, and/or enforcement of legal claims.

4. Lawful bases

The UK GDPR requires us to rely on one or more lawful bases to use your personal information. We consider the grounds listed below to be relevant:

a. **Consent:** Where you have provided your consent for us to use your personal information in a certain way (for example, we may ask for your consent to collect special categories of your personal information so that you may sit an exam with reasonable adjustments and/or special considerations).

b. **Legal Obligation:** Where necessary so that we can comply with a legal obligation to which we are subject (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services).

c. **Contract:** Where necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract (for example, to provide you with a certified award after sitting an examination).

d. **Legitimate Interest:** Where there is a legitimate interest in us doing so. The UK GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced, and does not unduly impact your rights as an individual). In broad terms, our "legitimate interests" means the interests of the RSL Group as a commercial entity and ensuring that appropriate levels of certified awards are granted to candidates in line with our standards. When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you, and on your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you.

5. Candidate research

We may also analyse your personal information to create a record of your interests and preferences. This allows us to ensure communications are relevant and timely, to contact you in the most appropriate and relevant way and in general to provide you with an improved user experience. It also helps us to understand the background of our candidates.

If you would prefer us not to use your personal information for candidate research, please let us know by using the contact details below.

6. Communications for marketing / promotional purposes

We may use your contact details to provide you with information about our work, events, services, and/or activities which we consider may be of interest to you (for example, about other certified awards we offer or training/learning providers we work with). Where we do this via email, SMS, or telephone (where you are registered with the Telephone Preference Service), we will not do so without your prior consent.

Where you have provided us with your consent previously but do not wish to be contacted by us about our work, events, services, and/or activities in the future, please let us know by email at info@rslawards.com. You can opt out of receiving emails from RSL at any time by clicking the "unsubscribe" link at the bottom of our emails.

7. Payments

When you use our secure online payment function you will be directed to a specialist payment services provider who will receive your financial information to process the transaction. We will provide your personal information to the payment services provider only to the extent necessary for the purpose of processing your donation/payment.

8. Children's personal information

When we process children's personal information, where required, we will not do so without their consent or, where required, the consent of a parent/guardian. We will always have in place appropriate safeguards to ensure that children's personal information is handled with due care.

9. How long do we keep your personal information?

In general, unless still required in connection with the purpose(s) for which it was collected and/or processed, we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it, or (iii) you validly exercise your right of erasure (please see Section 13 below), we will remove it from our records at the relevant time.

If you request to receive no further contact from us, we may keep some basic information about you on our suppression list in order to comply with your request and avoid sending you unwanted materials in the future.

10. Will we share your personal information?

We do not share, sell, or rent your personal information to third parties for marketing purposes. However, in general we may disclose your personal information to selected third parties in order to achieve the purposes set out in this Notice.

Sharing within the RSL Group

As a group of companies, we may share your personal information with other members of the RSL Group to provide a seamless service and for internal administration purposes. This includes sharing information between RSL Awards Limited, Rockschool Limited, Rockschool London Limited, Music Teacher Limited, and RSL Group Holdings Limited. All personal information shared within the RSL Group remains subject to the same strict data protection and security measures outlined in this Notice.

Sharing with external parties

These external parties may include (but are not limited to):

a. training/learning providers;

b. individual examiners;

c. educational authorities such as the Department for Education, Qualifications Wales, CCEA Regulation, SQA, or Ofsted;

d. local authorities and other public bodies responsible for education;

e. other educational establishments/prospective employers (for example, if a reference is sought);

f. suppliers and sub-contractors for the performance of any contract we enter into with them, for example, IT service providers such as website hosts or cloud storage providers;

g. professional service providers such as accountants and lawyers;

h. parties assisting us with research to monitor the impact/effectiveness of our work, events, services, and activities;

i. the police, for example in sharing data in relation to malpractice cases linked to fraud.

In particular, we reserve the right to disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the (prospective) seller or buyer of such business or assets;
- if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- if we are under any legal or regulatory duty to do so; and/or
- to protect the rights, property, or safety of the RSL Group, its personnel, users, visitors, or others.

11. Security / storage of and access to your personal information

The RSL Group is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organisational and technical measures in place to help protect your information. Your personal information is only accessible by appropriately trained staff, volunteers, and contractors, and stored on secure servers which have features to prevent unauthorised access.

12. International Data Transfers

Given that we are a UK-based organisation we will normally only transfer your personal information within the European Economic Area ("EEA") or to countries with an adequacy decision from the UK government.

However, because we may sometimes use agencies and/or suppliers to process personal information on our behalf, it is possible that personal information we collect from you will be transferred to and stored in a location outside the UK. Where your personal information is transferred, stored, and/or otherwise processed outside the UK in a country that does not offer an equivalent standard of protection, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses which have been approved by the UK Information Commissioner's Office) designed to protect your

personal information and to ensure that your personal information is treated securely and in accordance with this Notice.

Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure - however, once we have received your personal information, we will use strict procedures and security features to try and prevent unauthorised access.

13. Exercising your Rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing or promotional purposes or to unsubscribe from our email list at any time. You also have the following rights under UK GDPR:

- **Right of access:** you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information.
- **Right of erasure:** at your request, we will delete your personal information from our records as far as we are required to do so. In many cases, we would propose to suppress further communications with you rather than delete it.
- **Right of rectification:** if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.
- **Right to restrict processing:** you have the right to ask for the processing of your personal information to be restricted if there is a disagreement about its accuracy or legitimate usage.
- **Right to object:** you have the right to object to processing where we are (i) processing your personal information on the basis of our legitimate interests, (ii) using your personal information for direct marketing, or (iii) using your information for statistical purposes.
- **Right to data portability:** to the extent required by the UK GDPR, where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are a party, and in either case, we are processing using automated means, you may ask us to provide the personal information to you or another service provider in a machine-readable format.

You are also entitled to make a complaint to the Information Commissioner's Office - www.ico.org.uk.

14. Changes to this Notice

We may update this Notice from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing an update notice on our website.

15. Links and third parties

We link our websites directly to other sites. This Notice does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our websites.

16. How to contact us

Please let us know if you have any questions or concerns about this Notice or about the way in which the RSL Group processes your personal information by contacting us at the channels below. Please ask for / mark messages for the attention of the Data Protection Officer.

- **Email:** info@rslawards.com
- **Telephone:** 0345 460 4747
- **Post:**
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