

PRIVACY NOTICE

R Living

LET'S TALK PRIVACY!

1. WHAT IS A PRIVACY NOTICE?

R Living respects your privacy and is committed to protecting your personal data. The General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”) seeks to strengthen data protection standards and imposes various obligations on entities that process personal data. At R Living, we strive to uphold the high standards imposed by the GDPR.

This document, entitled *Privacy Notice*, applies to all personal data held by Roxy Home Furnishings Ltd (C14659) (or “**R Living**”) as the controller of your personal data, and explains, using simple and clear language, how we process your data, why, with whom this data may be shared, in what situations we may share this data, and all the measures we are taking to ensure that your data is safe and secure. The privacy policy will continue to apply for as long as we hold your personal data in terms of the law.

As shall be explained in more detail below, R Living may collect your personal data in various instances. We may collect your personal data when you purchase products from our outlet or request quotes. We may also collect this information for marketing purposes. We will collect personal data from our employees or potential employees when they submit a CV in the hopes of joining our team. Finally, we may also collect your personal data when you submit queries to us or provide us with feedback.

2. DATA CONTROLLER

The data controller as defined under the General Data Protection Regulation (EU) 2016/679 (the “**GDPR**”) is **Roxy Home Furnishings Ltd**, which trades under the *R Living* trademark (“**R Living**” or the “**Controller**”). The Controller is a private limited liability company registered under the laws of Malta with company registration number C14659, and having its registered office situated at R Living, Triq is-Sebh, Qormi QRM9055, Malta.

3. OUR DATA HANDLING PRACTICES

3.1 How we collect your personal data

R Living, through this website or through the general provision of its services, may collect personal data from you. We may collect your personal data in any of the below-mentioned events, which personal data may include the following:

- When you request a quote from R Living;
 - Name, mobile number, email address;
- When you become an R Living customer;
 - Name, home and mobile number, home address, email and tax information;

- When you subscribe to R Living's mailing list;
 - Name, age, and, depending on marketing channel opted for, mobile number, home address and, or email address;
- When you submit a query to R Living, whether via online channels such as this website or Facebook, by visiting our outlet, or by telephone;
 - Name, mobile number, email address;
- When you apply for a position with R Living by sending us your CV;
 - Name, age, mobile number, email address, information about qualifications and experience, and, if applying for the position of driver, your drivers' licence documentation;
- When you submit enquires about the personal data we hold about you in terms of this privacy policy:
 - Name, address, email address, and, for verification purposes, identity card documentation.

In any of the abovementioned events, we may request additional information if we deem such to be necessary.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this situation, we may have to cancel the contract you have entered into with us, but we will notify you if this is the case.

3.2 CCTV

In line with our security policy, we have installed CCTV cameras in the main areas of our outlet. Notices are affixed on our outlet walls to inform you of this form of surveillance as you walk in. These cameras are used solely for security purposes or for statistical purposes. Our cameras do not record sound.

3.3 Special categories of personal data

Certain other information may be classified as special categories of personal data. Such include any information relating to the following;

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric data for the purpose of uniquely identifying a natural person;
- Data concerning health;
- Data concerning a natural person's sex life or sexual orientation.

Unless authorised or required by law, we will never store or process any data which is deemed to consist of special categories of data without obtaining your prior written consent.

4. OUR COMMITMENT TO YOU

We are committed to ensuring that:

- Your data is processed according to law;
- Your data is not processed in violation of your rights;
- Your data is obtained and stored for a specific lawful purpose;
- You are properly informed about your rights and about your data;
- The data processed is required and not excessive;
- Your information is accurate and updated;
- Your information is stored safely and securely;
- R Living's IT systems are properly protected from attack in order to safeguard your data;
- Your data is kept in accordance with our established timeframes, and not for any longer period than is strictly required;
- Your data is not transferred to jurisdictions which do not adhere to equivalent data protection standards without the appropriate safeguards as stated under law.

5. LEGAL BASIS FOR COLLECTION

We process your data legally in terms of current laws and regulations, inclusive of the GDPR, and, of course, in accordance with our internal data protection policy. More specifically:

- As an applicant wishing to work for R Living, we process your personal data on the basis that:
 - You have consented to the processing of the personal data;
- As a customer, we process your personal data on the basis that:
 - Processing is necessary for the performance of our obligations;
 - Processing is necessary due to other obligations imposed by law;
 - Processing is necessary for our legitimate interests:
 - To recover any debts that may become due to us;
 - To keep our records updated;
- In relation to marketing, we process your personal data on the basis that you have consented to such marketing through our Marketing Preferences page, accessible [here](#), and as long as you have not opted out of that marketing.

6. THE WAY WE PROCESS YOUR DATA

Your data is processed through our systems usually for R Living to be able to provide you with our services. Data is stored on our internal systems and servers and is analysed by our personnel in order for us to be able to provide our services. If you have applied for a position with R Living, your personal information will be analysed so as to assess your suitability for the role. If you have subscribed to our mailing list, your personal information

shall be used so that we can send you updates about our services, R Living promotional content, special offers about our products and news about us. If you are our customer, we may insert your personal details into our systems in order to facilitate your future purchases. If you contact us with queries, we will not use your data, other than for statistical purposes, after we have answered any of your queries.

In some cases, your data may also be processed by one of our entrusted third party processors in terms of the current data protection laws, who will assist us in fulfilling our service standard. For more information on third party processors, please refer to section 9 of this Privacy Notice. The law further obliges us to share your data with competent authorities in certain situations as detailed under the relevant laws and regulations.

7. YOUR RIGHTS AS A DATA SUBJECT

As a data subject, that is, as a person whose data we hold, you have certain important rights under the GDPR. We are bringing them to your attention hereunder:

- You have the right to access your data. You have the right to ask for a copy of your personal data.
- You have the right to request the rectification of incorrect data. If any data we hold about you is incorrect, you have a right to ask for the correction of such data.
- You have the right to be forgotten. You may request that R Living deletes any information we hold about you. As explained above, your personal data will not be held indefinitely, but will be retained in accordance with our data retention policy. We will not be able to delete your data if the law obliges us to keep it for a stated amount of time.
- You have the right to restrict our data processing. This can be done in the following cases:
 - i. Where you are contesting the accuracy of the data we hold about you, while such a claim is being vetted;
 - ii. If we process your data unlawfully;
 - iii. If we no longer need your data but are keeping the data because we need it for a legal claim.
- You have the right to data portability. Your data may be requested in a machine-readable format and you may also request that your data be transferred directly to another person or service provider.
- You may object to the processing of your data. You may at any time notify us that you are objecting to the use of your data for direct marketing, after which notification we shall stop using your data for such purposes.
- If you have provided consent for the processing of your data you have the right to withdraw that consent at any time, which withdrawal will not affect the lawfulness of the processing before your consent was withdrawn.

Kindly note, however, that your exercise of rights (3), (4), (6) and (7), will probably hinder the ability of R Living to provide you with the required services. We will notify you if this is the case.

In submitting a request to exercise any of the above rights, please note that:

- We will analyse your request and provide you with a reply within 30 days, except in extreme situations

as allowed under law. In any such instance, we will provide you with information as to why your request was not acceded to within the 30-day period;

- We have the right to refuse your request or charge a reasonable fee therefor in extreme situations where your requests are manifestly unfounded, unnecessarily repetitive or abusive;
- When you are making a request, we may request documentation to identify the person making the request.

You have the right to make a complaint at any time to a data protection supervisory authority, including the authority of your habitual residence, if you believe that we have breached any data protection laws. In the case of Malta, the supervisory authority is the Office of the Information and Data Protection Commissioner (www.idpc.org.mt) (the “IDPC”). We would, however, appreciate the chance to deal with your concerns before you approach the IDPC, so please **contact us** in the first instance.

8. MARKETING

We may send marketing material to individuals who have subscribed to our mailing list in order to update them about the services that we offer, R Living promotional content, special offers about our products and news about us.

You may manage your marketing preferences by clicking [here](#) to subscribe or unsubscribe at any time.

If you unsubscribe, we shall not send you any more marketing information, and if you are not a customer of R Living, we shall also delete all your personal data.

9. SHARING INFORMATION WITH THIRD PARTIES

We have appointed third parties to assist us in the provision of our services. In some cases, therefore, your data will be transferred to such third parties; alternatively, such third parties may have access to your data. These third parties can be classified in the following categories:

IT security	Service providers who help R Living in ensuring that your data remains secure
IT backups	Service providers who assist R Living in relation to backups for business continuity purposes so that your data is not lost
Auditing and payroll	Service providers who carry out our statutory auditing as well as provide payroll assistance
Administration	Service providers who provide software and administrative assistance in order to enable us to better organise our internal administrative processes
Third party consultants	Experts who assist us in various regulatory compliance matters
Marketing	Service providers who assist us in relation to marketing
Suppliers	Suppliers of furniture
Furniture installers	Service providers who assist us in providing you with our services by allowing R Living to deliver our products to you as required
Transport and mobility companies	
Repairs	
Design software providers	

Personal data shall only be shared with or accessed by such third parties if:

- We have obtained your consent for this purpose beforehand;
- Such transfer of data is necessary for the performance of our services;
- Such transfer of data is required under law or in view of a lawful request by a competent judicial authority.

In this regard, we shall always provide information on such transfers unless prohibited by law.

10. TRANSFERS TO THIRD COUNTRIES

We shall endeavour to send your data only to EU countries or third countries which ensure an adequate standard of protection for your data. When transferring your data to countries which are not deemed to offer such adequate protection, proper measures in terms of the law shall be applied to ensure the protection of your personal data. In cases where such measures cannot be achieved, personal data shall only be sent to these countries if such is necessary to perform our services, and shall be subject to your prior consent.

11. DATA RETENTION

We will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal requirements that may be incumbent upon us.

In this regard, R Living stores your personal information as follows:

- Any personal information on prospective employees shall be deleted immediately after we decide that such individual will not be engaged with R Living, unless consent for retention is provided. In such case, we will keep your information for six months;
- Any information in relation to customers shall be kept for five years;
- You may also at any time object to receiving R Living marketing material by unsubscribing from our mailing list. In such case, we shall not send you any more marketing information, and shall also delete any personal information provided unless you are also a customer.

12. SECURITY OF DATA

R Living utilises adequate security systems to ensure that your data is kept in a secure and safe manner, and has also invested considerable resources in this regard. Such measures may include encryption, firewalls, special software as well as the engagement of specialised individuals to ensure that your data is safeguarded from an IT perspective.

13. HYPERLINKS

Kindly note that our website may contain hyperlinks to other websites. R Living is not responsible for the content of these other websites or their respective adherence to data protection laws and rules. R Living does not provide any quality controls to such websites and shall accept no responsibility for their performance, security, accuracy, content or privacy in relation to your personal data.

14. CHANGES TO OUR PRIVACY NOTICE

Due to the fact that technology and the relevant legislation regarding data protection and data privacy changes at a rapid pace, R Living may make amendments to this Privacy Notice. If the changes are substantial, we will inform you before such changes are made.

15. ENQUIRIES

We are happy to answer any queries you may have. Should you desire to:

- make any enquiry regarding your personal data;
- have your personal data corrected; or
- request access to your personal data

you may contact our Data Protection Manager on the below contact details. As explained further above, we may refuse such requests or charge a reasonable fee where these requests are manifestly repetitive or excessive.

Any request must be made in writing and must also include your name, address, email address and a description of the information or correction required. We may also ask for identification documentation, which is essential in order for us to be able to verify your identity.

Email: stephen@rliving.com.mt

Telephone number: +356 21 499 699

Address of R Living: R Living, Triq is-Sebh, Qormi QRM9055, Malta