RSS Website and Services Privacy Policy

Retail Spotter Solutions (RSS)

Effective date: 20 November 2026

This Privacy Policy explains how The Ministry Group Elevation Ltd collects, uses, stores and shares personal information when you use the RSS website, the digital TPC Catalogue, an optional print listing or RSS buyer introduction services. It applies to catalogue-only and full RSS registration. The relevant service agreement sets out the commercial terms.

1. Who we are

The Ministry Group Elevation Ltd is the controller of personal information described in this Privacy Policy unless another organisation is separately responsible for its own processing.

Trading names covered: Retail Spotter Solutions (RSS) and The Product Co-op (TPC), when delivering TPC catalogue and RSS introduction services. RSS approves and adds products to the TPC catalogue; TPC promotes and distributes it. RSS handles registration, buyer enquiries, payments and introductions. TPC is another trading name of the same company, not a separate data controller for these activities.

Company number: 16273971

Registered office: 3rd Floor, 86-90 Paul Street, London, England, United Kingdom, EC2A 4NE

Privacy and data-protection contact: info@retailspottersolutions.com

Website: https://www.retailspottersolutions.com/

2. Scope of this Privacy Policy

This Privacy Policy covers personal information used for the RSS website, enquiries, digital and print catalogue distribution, buyer introductions and related payments. It applies to catalogue-only and full RSS registration, including Pay-As-You-Go (PAYG) and the Retail Outcome Assurance Bundle. It covers brand representatives, sole traders, retail buyers, business contacts and website visitors, including when TPC helps deliver these services.

The RSS website is primarily intended for business users. It is not intended for children, and RSS does not knowingly seek to collect personal information from children through the website.

3. Personal information we may collect

Depending on how you interact with RSS, we may collect the following categories of information:

- Identity and contact information, such as your name, business email address, telephone number, WhatsApp number and preferred contact method.
- Business information, such as business name, trading name, company number, business address, website, social-media details, your position or role and information confirming your authority to act for the business.

- Product and commercial information, such as product descriptions, SKUs, product size or weight, product category, shelf life, storage requirements, wholesale price, case size, recommended retail price, manufacturing country, supply readiness, delivery information, returns information, distribution information, existing listings or relationships, food-safety certifications, product photographs and logos.
- Registration and service information, including your registration route, agreement acceptance, accepted prices, sample or sale-or-return choices, optional print listings, buyer enquiries, opportunities you accept or decline, retail locations, introductions, changes of route, replacement credits and refunds. Where applicable, we also record Bundle cycles and commercial outcomes.
- Buyer interest, replies and outcomes, including buyer contact details, role or authority, retail location, product interests and willingness to receive samples or sale-or-return stock. We may record whether and when the buyer replied, the channel they used and relevant correspondence. Where needed, we record purchase or order dates and values, dates stock was accepted for sale-or-return and proportionate supporting evidence. Please remove unrelated personal information from any evidence you provide.
- Communications, including enquiries, callback requests, emails, messages, meeting or scheduling information and records of relevant business communications.
- Payment and transaction information, including amounts, dates, references, payment status, what the payment covers, credits and refunds. Our payment provider or bank may handle the payment. Where you pay by card, the payment provider normally handles the full card details.
- Technical information generated when you use the website, which may include IP address, browser or device information, security and server-log information, and cookie or similar-technology data used by the website platform or embedded services.

RSS does not ask you to provide special-category personal information through its normal website or Client application process. Please do not provide sensitive personal information unless RSS specifically asks for it and there is a lawful reason to do so.

Registration and purchases are voluntary. We identify required information in the relevant process. If you do not provide information needed to assess a listing, confirm buyer interest, complete a handover or administer an agreement, we may be unable to provide that part of the service. Where an agreement requires outcome reporting or supporting evidence, the applicable agreement explains those obligations.

4. How we collect personal information

We may collect personal information:

- directly from you through enquiries, catalogue-only or full registration, catalogue enquiry buttons, correspondence, meetings, handovers and outcome reports;
- through the RSS website, which is built and hosted using Wix;
- through Fillout for the RSS Client application form and any other forms we identify to you when used;
- through payment or banking providers when you pay for an introduction, Bundle or optional print listing;
- through Google-based internal systems used by RSS to manage Client and operational records;
- from retail buyers, brands and authorised service partners when qualifying enquiries, arranging introductions, checking responses or verifying commercial outcomes;

- through YouTube where videos are embedded on the website, and through Calendly if RSS introduces Calendly for appointment scheduling; and
- automatically through necessary website technologies, server logs, security tools, cookies or similar technologies.

If we obtain your information from another source, we provide the applicable privacy information within a reasonable period and no later than one month. If we contact you or disclose the information to someone else sooner, we provide it by that first contact or disclosure. An exception may apply where permitted by law. You may ask us where the information came from.

5. Why we use personal information and our lawful bases

The following paragraphs set out our purposes and principal lawful bases. Contract applies where processing is necessary for a contract with you personally, including a sole trader, or steps you request before entering one. For employees and representatives of corporate clients or buyers, we normally rely on legitimate interests in managing business relationships rather than treating the company's contract as a contract with that individual. We assess whether those interests are outweighed by your rights and freedoms.

Operate and protect the website

Hosting, security, troubleshooting and fraud prevention.

Main lawful basis: Legitimate interests in operating a secure service; legal obligation where applicable.

Respond to enquiries and assess registrations

Contact requests, suitability checks and catalogue-only or full registration.

Main lawful basis: Contract or requested pre-contract steps with an individual; otherwise legitimate interests in assessing and managing business relationships.

Publish and distribute catalogue listings

Use supplied listing content, administer optional print listings and route buyer enquiries.

Main lawful basis: Contract where necessary for an individual's listing; otherwise legitimate interests in promoting participating brands and connecting buyers.

Deliver introductions and administer service routes

Qualify interest, complete handovers and record acceptances, locations and upgrades.

Main lawful basis: Contract with an individual; otherwise legitimate interests in providing and administering business introductions.

Check buyer replies, Bundle outcomes and claims

Check replies and commercial outcomes, administer Retail Outcome Assurance for Bundle clients and assess replacement credits and refunds.

Main lawful basis: Contract with an individual; otherwise legitimate interests in accurate service administration, preventing misuse and resolving claims.

Take and record payment

Record payments for introductions, Bundles and optional print listings, as well as credits, refunds and other financial records.

Main lawful basis: Contract with an individual; legitimate interests in business payment administration; legal obligation for required records.

Maintain records and protect legal rights

Accounting, compliance, complaints, debt recovery and claims.

Main lawful basis: Legal obligation where applicable; legitimate interests in maintaining evidence and protecting legal rights.

Send business marketing

Relevant catalogues and promotions; maintain opt-out records.

Main lawful basis: Consent where required; otherwise legitimate interests in relevant business promotion, subject to your right to object.

Provide embedded or scheduling features

Video and appointment functionality where used.

Main lawful basis: Consent where required for non-essential device access; otherwise legitimate interests in providing requested features or contract where applicable.

6. Catalogue, introduction and payment records

We use the details and images you supply to prepare an approved listing in the digital TPC Catalogue and process buyer enquiries. Digital listing is free. If a print listing has a fee, we tell you the fixed price and the edition before you confirm. We record the edition, your confirmation and any payment to manage your print listing.

For buyer introductions, we record the date we send an opportunity, whether and when you accept or decline, the retail locations accepted and the date we put you in touch with the buyer. These records help us manage introductions, response deadlines and any charges that apply.

For catalogue-only and PAYG introductions, we use relevant buyer replies and proportionate supporting evidence to check when the introduction fee is earned and to assess replacement credits and refunds. This can include the date and channel of a genuine buyer reply after we put you in touch. We may contact the buyer directly where necessary to verify whether they replied.

Retail Outcome Assurance applies only to the Bundle. We record Bundle cycles and use handover and outcome dates to link outcomes to introductions. This helps us determine when a Bundle ends and when its fee is earned.

Under the RSS Client Services Agreement, Pay-As-You-Go and Bundle clients must report any qualifying commercial outcome that occurs within 180 calendar days of a valid handover. Tell RSS within 3 working days of becoming aware of it. For a purchase or confirmed order, we record the date and order value. For sale-or-return, we record the date the retailer accepted the stock. We may contact the buyer directly if we need to verify the outcome.

We keep a record of your registration route and any change to it so we can apply the correct agreement, prices and credits, including eligible replacement credit carried over on upgrade. We also record PAYG advance payments and how they are used, amounts paid for introductions or a Bundle, and credits and refunds. We distinguish payments received from fees earned under the applicable agreement.

The TPC Catalogue Listing Agreement governs catalogue-only registration. The RSS Client Services Agreement governs full RSS registration. This policy explains how we use personal information for each service.

Payment information is handled according to the payment method used. This may involve a third-party payment service provider or RSS's banking provider, each operating under its own privacy and security arrangements. RSS may retain records confirming payment and transaction status for contractual, accounting and legal purposes. Where a payment link is used, the payment page will identify the relevant provider.

7. Who we share personal information with

We share relevant personal information only where necessary for the purposes explained in this policy. Recipients may include the following providers and business counterparties:

- Wix: website platform, hosting, website forms, security and technical services;
- Fillout: hosting and processing the RSS Client application form and other identified forms where used;
- Google services: internal business records, CRM-style administration, document or communication management;
- Payment service providers and banking providers for introduction, Bundle and optional print payments, and to administer related credits, refunds and financial records;
- YouTube / Google: embedded video functionality;
- Calendly: appointment scheduling if and when RSS implements this feature; and
- professional advisers, insurers, auditors, regulators, courts, law-enforcement bodies or public authorities: where reasonably necessary or legally required.

Retail buyers and brands: relevant business contact details, product interests, retail locations and enquiry information for accepted introductions, professional handovers and proportionate response or outcome checks. Each business is responsible for its own subsequent processing and commercial dealings. Buyer contact details for a chargeable RSS opportunity are released through the applicable acceptance and payment process. RSS does not sell personal information to advertisers.

Approved listings may be publicly accessible online and shared by email, WhatsApp, print or post. We publish the business and product information you supply for your listing. We exclude payment records, private correspondence and verification evidence from published listings. Please keep private information out of the listing material you supply. Authorised staff, contractors and service partners, including those working under TPC, may access information needed to administer listings, enquiries and introductions. If we use a printing or distribution provider, we share the approved material and delivery details it needs. Appropriate confidentiality and data-protection arrangements apply.

8. International transfers

Some providers may process information outside the United Kingdom, including in the United States or European Economic Area, depending on the provider and account configuration. This may include our website, forms, business systems, communications, embedded content, scheduling and payment providers. We consider the actual processing locations and safeguards when using these services.

For restricted transfers, we use an applicable UK adequacy arrangement or appropriate safeguards, such as the UK International Data Transfer Agreement or the UK Addendum to approved Standard Contractual Clauses, with any assessment and supplementary measures required by law. Where relying on a certification-based adequacy arrangement, the recipient and transfer must fall within its scope.

You may contact RSS at info@retailspottersolutions.com if you would like further information about the safeguards relevant to a particular transfer.

9. Cookies, embedded content and similar technologies

The website may use cookies and similar technologies that are necessary for security, core website functionality and the operation of the Wix platform. RSS does not currently use Google Analytics, Meta Pixel, Google Ads, LinkedIn Insight Tag, TikTok Pixel or comparable advertising or behavioural-tracking tools.

The website may include embedded YouTube videos. Where reasonably practicable, RSS uses YouTube's privacy-enhanced embedding. YouTube or other third-party content may still process information when you interact with embedded content.

RSS may also introduce Calendly for scheduling. If a third-party feature uses non-essential cookies or similar technologies that require consent, RSS will use an appropriate consent mechanism and will not intentionally activate those non-essential technologies before the required consent has been obtained.

RSS uses a cookie banner / cookie-management mechanism to give visitors a genuine choice over non-essential cookies where consent is required. Necessary cookies may operate without consent where the law permits, but information about them is still provided.

10. Marketing communications

RSS and TPC may distribute product catalogues and send relevant business marketing by email, WhatsApp, post or other permitted channels. We rely on legitimate interests for relevant business marketing where appropriate, and obtain consent where required for the channel and recipient. For electronic marketing to sole traders and other individual subscribers, we obtain consent unless a lawful exception applies. Accepting a service agreement does not itself constitute consent to unrelated marketing.

You may object to direct marketing at any time, free of charge, using the opt-out provided or by contacting info@retailspottersolutions.com. We stop using your personal information for that marketing and may keep minimal suppression records to respect your choice. Necessary non-promotional service messages, such as payment, handover or account notices, may continue. Promotional content is not treated as a service message merely because you have registered.

11. How long we keep personal information

RSS keeps personal information only for as long as reasonably necessary for the purpose for which it was collected, including to manage enquiries and applications, perform contracts, maintain appropriate business records, comply with legal, tax or accounting obligations, resolve disputes and establish or defend legal claims.

Retention depends on the purpose of each record. We keep active listing and contact details while needed for the listing or relationship and review unsuccessful or withdrawn applications when they are no longer needed. We keep listing, introduction, buyer reply, outcome, Bundle, credit and payment records for the applicable service periods and for any longer period needed for accounting, disputes or legal claims. The 180-day period for linking an outcome to an introduction does not set the deletion date for all records. We retain minimal opt-out information for as long as needed to honour an objection to marketing. We consider legal requirements, limitation periods, sensitivity and ongoing necessity when setting and reviewing retention periods.

Information may exist temporarily in backups or archived systems after it is removed from active systems. Service providers such as Wix, Fillout, Google and any payment or banking provider used by RSS may also retain information in accordance with their own contractual, security, legal and backup requirements.

When a listing is removed, we update versions and channels under our control as reasonably practicable. Previously distributed printed or downloaded catalogues and records independently held by recipients may remain outside our control. This does not limit your rights in relation to personal information we continue to process.

12. Security

RSS takes reasonable technical and organisational measures designed to protect personal information against unauthorised access, loss, misuse, alteration or disclosure. RSS also uses established third-party providers for website hosting, forms, business systems and payments.

No internet transmission or storage system can be guaranteed to be completely secure. You are responsible for taking reasonable care when sending information electronically and for ensuring that information you provide is accurate and appropriate.

13. Your data-protection rights

Depending on the circumstances and the lawful basis used, UK data-protection law may give you rights to:

- ask for access to personal information held about you;
- ask for inaccurate or incomplete information to be corrected;
- ask for personal information to be erased in certain circumstances;
- ask for processing to be restricted in certain circumstances;
- receive certain information in a portable format where the right to data portability applies;
- object to processing based on legitimate interests where applicable, and object to direct marketing at any time;
- withdraw consent at any time where RSS relies on consent, without affecting processing carried out before withdrawal; and

- complain to RSS or to the Information Commissioner’s Office (ICO) about how we handle your personal information.

Some rights have legal conditions or exceptions. To exercise a right, contact info@retailspottersolutions.com. We may need to verify your identity before acting on a request.

To make a data protection complaint to RSS, email info@retailspottersolutions.com or write to the address in section 17. We will acknowledge your complaint within 30 days, look into it, keep you informed and tell you the outcome without undue delay. You can also complain directly to the ICO at any time at https://ico.org.uk/make-a-complaint/.

14. Automated decision-making

RSS does not currently make solely automated decisions that produce legal or similarly significant effects on individuals. Registration, introduction and catalogue-placement decisions involve operational review. We may use registration status and service records to administer the applicable route, but this does not create automated approval of a paid introduction.

15. External websites and third-party services

The RSS website may contain links to external websites or services. Third parties such as Wix, Fillout, YouTube, Google, Calendly and any payment or banking provider used by RSS may process information under their own privacy notices in circumstances where they act as independent controllers. RSS is not responsible for the privacy practices of external websites that it does not control. You should review the relevant third party's privacy information where appropriate.

16. Changes to this Privacy Policy

RSS may update this Privacy Policy where its website, services, suppliers, legal obligations or data-processing activities change. The latest version will be published on the RSS website with an updated effective date. Material changes will be brought to users' attention where appropriate.

17. Contact us

If you have a question about this Privacy Policy, want to exercise a right or wish to make a data protection complaint, contact:

Retail Spotter Solutions (RSS)

The Ministry Group Elevation Ltd

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Email: info@retailspottersolutions.com

Company number: 16273971