

DATA PRIVACY MATTERS

**This is your guide to how personal data is managed by Pollock Lifts.
Please read it carefully.**

Data privacy is taken very seriously at **Pollock Lifts**. It is important that you know exactly what we do with the personal information you and others provide to us, why we gather it and what it means to you. This document outlines our approach to Data Privacy to fulfil our obligations under the General Data Protection Regulation (2018). We also welcome it as an opportunity to reassure you of the importance we place on keeping your personal data secure, and of the strict guidelines we apply to its use. We want you to be clear on:

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*This notice applies to all our products and services. Your product or service terms and conditions will specify which of our businesses is providing the relevant product or service to you.

If you have any questions about how your information is gathered, stored, shared or used, please contact our Data Protection Coordinator. You have a number of rights in relation to your information, including the right to object to processing of your personal information for direct marketing or where the legal basis for our use of your data is our legitimate business interests or performance of a task in the public.

1. Who we are

Throughout this document, “we”, “us”, “our” and “ours” refer to **Pollock Lifts**.

2. The information we collect about you

There are a number of reasons for gathering information about you. For instance, we need to know how to get in touch with you, so we can ensure the safe and reliable operation of your product as well as offer you products and services that complement and enhance your customer experience. The information we collect falls into **various categories**

▶ **Identity & contact information**

Name, contact details, home and work address, email address, work and personal phone numbers and tax related information.

▶ **Information you provide us about others or others provide us about you**

If you give us information about someone else (for example, information about a spouse or dependant, or someone gives us information about you, we may add it to any personal information we already hold and we will use it in the ways described in this Data Privacy Notice.

Before you disclose information to us about another person, you should be sure that you have their agreement to do so. You should also show them this Data Privacy Notice. You need to ensure they confirm that they know you are sharing their personal information with us for the purposes described in this Data Privacy Notice.

▶ **Sensitive categories of data**

We may hold information about you which includes sensitive personal data, such as health information. We will only hold this data when we need to for the purposes of the product or services we provide to you or where we have a legal obligation to do so.

Examples of when we use this type of data include:

- ▶ Medical information when you apply for applicable VAT status.

▶ **Information about you provided by others**

If you give us information about someone else, or someone gives us information about you, (for example, where another person provides your information to us during the course of a joint application), we may add it to any personal information we already hold and use it in the ways described in this Data Privacy Notice.

▶ **Other personal information**

- ▶ Telephone and image recordings.
- ▶ CCTV images at our offices (but only for health & safety and security reasons and to help prevent fraud or crime).
- ▶ Information in relation to data access, correction, restriction, deletion, porting requests and complaints.

3. When and how we collect information about you

As you use our services, apply for products, make enquiries and engage with us, information is gathered about you. Where you have chosen to make your information publicly available, such as social media sites.

When we collect information about you:

- ▶ When you ask us to provide you with certain products and services.
- ▶ When you use our website and online services provided by us and visit our branches or offices.
- ▶ When you or others give us information verbally or in writing. This information may be on application forms, in records of your transactions with us or if you make a complaint.

- ▶ From information publicly available about you – for example in trade directories, online forums, websites, Facebook, Twitter, YouTube or other social media. When you make information about yourself publicly available on your social media accounts or where you choose to make information available to us through your social media account, and where it is appropriate for us to use it, this information can help enable us to do things like (1) improve our service (for example, identifying common service issues), (2) personalise your online experience with us, (3) contact you through the social media services, and (4) enable you to share your experience and content via social media services. For a description on how social media services and other third party platforms, plug-ins, integrations or applications use your information, please refer to their respective privacy policies and terms of use, which may permit you to modify your privacy settings.
- ▶ From your online activities with third parties where you have given us your consent (for example, by consenting to our use of certain cookies or other location tracking technologies).

4. How we use your information

Whether we're using it to confirm your identity, to help in the processing of an application for a product or service or to improve your experiences with us, your information is always handled with care and the principles outlined in this Data Privacy Notice are always applied.

We use your information:

To provide our products and services to you, and to fulfil our contract with you

To provide our products and services to you and perform our contract with you, we use your information to:

- ▶ Manage and administer your account, product, benefits or other products and services that we or our partners may provide you with.
- ▶ Contact you by post, phone, text message, email, social media, fax, using our online banking website or other means, but not in a way contrary to your instructions to us or contrary to law.
- ▶ Monitor and record our conversations when we speak on the telephone (for example, to check your instructions to us, to analyse, to assess and improve customer service and for training and quality purposes).
- ▶ Recover debts you may owe us.
- ▶ Manage and respond to a complaint or appeal.

To manage our business for our legitimate interests

To manage our business we may use your information to:

- ▶ **Carry out credit scoring, credit management including collecting and enforcing debts and arrears**

We may:

- ▶ Tell credit reference and credit registration agencies about your dealings with us including details of your credit facilities and your credit history with us. We may also search the Central Credit Register where permitted but not obliged to do so.
- ▶ Engage agencies to trace you (for example, where the address you have provided is no longer accurate and we need to provide you with legal documentation).
- ▶ **Provide service information, to improve our service quality and for training purposes**
We may gather information about your interactions with us for the betterment of our service provision.
- ▶ **Conduct marketing activities**
For example, running competitions, promotions and direct marketing (provided that you have not **objected to us using your details in this way**), and research, including customer surveys, analytics and related activities.

▶ **To run our business on a day to day basis including to:**

- ▶ Carry out strategic planning and business portfolio management.
- ▶ Compile and process your information for audit, statistical or research purposes (including, in some instances, making your data anonymous) in order to help us understand trends in our customer behaviour and to understand our risks better, including for providing management information, operational and data risk management.
- ▶ Protect our business, reputation, resources and equipment, manage network and information security (for example, developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services) and prevent and detect fraud, dishonesty and other crimes (for example, to prevent someone trying to steal your identity), including using CCTV at our premises.
- ▶ Manage and administer our companies legal and compliance affairs, including complying with regulatory guidance and voluntary codes of practice to which we have committed.
- ▶ To share or access your information for internal administrative purposes, audit, prudential, statistical or research purposes (including making your data anonymous) to help us understand trends in customer behaviour, for helping us to understand our risks better and for the purposes set out in this Privacy Notice (but not for the purposes of direct marketing where you have objected to this).

To comply with our legal and regulatory obligations

We need to use your information to comply with legal and regulatory obligations including:

- ▶ Complying with your information rights.
- ▶ Providing you with statutory and regulatory information and statements.
- ▶ For other reasons where a statutory reason exists we do so
- ▶ Complying with court orders arising in civil or criminal proceedings.
- ▶ Performing a task carried out in the public interest.

Where you have given us permission (which you may withdraw at any time)

Where you have given us permission (which you can withdraw at any time) we may:

- ▶ Send electronic messages to you about product and service offers from our Company.
- ▶ Share your data with third parties so that they may send you electronic messaging about their
- ▶ Use cookies in accordance with our Cookie Policy.
- ▶ Use special categories of data, or sensitive data.
- ▶ Use information you have made public and combine with this with the activities outlined above.

When we ask for your consent, we will provide you with more information on how we will use your data in reliance on that consent, including in relation to third parties we would like your consent to share your data with.

5. Who we share your information with

We only share your information with a select number of individuals and companies, and only as necessary. Sharing can occur in the following circumstances and/or with the following persons:

▶ **Your authorised representatives:**

- ▶ These may include a nominated grant officer, social worker, occupational therapist and any other party authorised by you to receive your personal data.

- ▶ **Companies that provide support services for the purposes of protecting our legitimate interests.**
 - ▶ Your personal information remains protected when our service providers use it. We only permit service providers to use your information in accordance with our instructions, and we ensure that they have appropriate measures in place to protect your information.
 - ▶ Our service providers include IT and telecommunication service providers, data processors, contractors, providers of administration services, debt collection agencies, receivers, liquidators, examiners, auditors, and consultants, including legal advisors.
- ▶ **Our bank**
 - ▶ In the normal course of business we may give information about you (Debtor Information) to our bank (The Bank) to allow them to provide services to us and to manage our account. The Debtor information may also identify the names or other personal information (such as address information) of your owners, partners or directors.
 - ▶ The Debtor Information may include details of account balances, historical payment experiences, and other information regarding the conduct of your account such as disputes, defaults etc.
 - ▶ The Bank may store and process the Debtor Information on their computer system (s) and in any other way. Such information may be used by them and other companies within their Group for training purposes, credit or financial assessments, market and product analysis, making and receiving payments, recovering monies and preparing statistics. They may also use such information to prevent fraud, bad debts and money laundering.
 - ▶ The Bank may also give information about your account and its indebtedness to: their insurers or re-insurers so they can quote for and issue any policy or deal with any claim; any guarantor or indemnifier of our obligations to them (if any); and Group company of them or any advisor acting on our or their behalf.
- ▶ **Statutory and regulatory bodies (including central and local government) and law enforcement authorities.**

6. How long we hold your information

The length of time we hold your data depends on a number of factors, such as **regulatory rules and the type of financial product we have provided to you.**

- ▶ Those factors include:
 - ▶ The regulatory rules
 - ▶ Whether you and us are in a legal or some other type of dispute with another person or each other.
 - ▶ The type of data we hold about you.
 - ▶ Whether you or a regulatory authority asks us to keep it for a valid reason.
- ▶ **As a general rule, we keep your information for a specified period after the date on which a transaction has completed or you cease to be a customer. In most cases this period is seven (7) years.**

9. Implications of not providing information

Sharing information with us is in both your interest and ours.

- ▶ **We need your information in order to:**
 - ▶ Provide our products and services to you and fulfil our contract with you.
 - ▶ Manage our business for our legitimate interests.
 - ▶ Comply with our legal obligations.
- ▶ **Of course, you can choose not to share information, but doing so may limit the services we are able to provide to you.**
 - ▶ We may not be able to provide you with certain products and services that you request. We may not be able to continue to provide you with or renew existing products and services.
- ▶ **When we request information, we will tell you if providing it is a contractual requirement or not, and whether or not we need it to comply with our legal obligations.**

10. The legal basis for using your information

We will use your data and **share that data** where:

- ▶ Its use is necessary in relation to a **service or a contract** that you have entered into or because you have asked for something to be done so you can enter into a contract with us.
- ▶ Its use is in accordance with our **legitimate interests** outlined in this notice.
- ▶ Its use is necessary because of a **legal obligation** that applies to us
- ▶ You have **consented** or **explicitly consented** to the using of your data (including special categories of data) in a specific way.
- ▶ Its use is necessary to protect your **“vital interests”**.
- ▶ Where the processing of special categories of data is necessary for the establishment, exercise or defence of legal claims.
- ▶ Where authorised by law or regulation, we may undertake processing of special categories of data for a substantial public interest.

10. How to exercise your information rights (including the right to object)

Providing and holding personal information comes with significant rights on your part and significant obligations on ours.

You have **several rights** in relation to how we use your information. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise:

You have the right to:

- ▶ Find out if we use your information, to access your information and to receive copies of the information we have about you.
- ▶ Request that inaccurate information is corrected and incomplete information updated.
- ▶ Object to particular uses of your personal data where the legal basis for our use of your data is our legitimate business interests (for example, profiling we carry out for our legitimate business interests) or the performance of a task in the public interest. However, doing so may have an impact on the services and products we can / are willing to provide.
- ▶ Object to use of your personal data for direct marketing purposes. If you object to this use, we will stop using your data for direct marketing purposes.
- ▶ Have your data deleted or its use restricted – you have a right to this under certain circumstances. For example, where you withdraw consent you gave us previously and there is no other legal basis for us to retain it, or where you object to our use of your personal information for particular legitimate business interests.
- ▶ Obtain a transferable copy of certain data to which can be transferred to another provider, known as “the right to data portability”.
 - ▶ This right applies where personal information is being processed based on consent or for performance of a contract and the processing is carried out by automated means. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access. The right also permits the transfer of data directly to another provider where technically feasible. Therefore, depending on the technology involved, we may not be able to receive personal data transferred to us and we will not be responsible for the accuracy of same.
- ▶ Withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.

We are obliged to respond without undue delay. In most instances, we will respond within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons why. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise.

11. How to contact us and/or our Data Protection Coordinator

If you have any questions about how your personal data is gathered, stored, shared or used, or if you wish to exercise any of your data rights, please contact our Data Protection Officer at

Telephone: 028 9336 8167

Postal Address: Pollock Lifts 1 Sloefield Drive Carrickfergus BT38 8GX

12. Changes to this notice

We will update this Data Privacy Notice from time to time. Any changes will be made available on this page.