

# **Privacy Notice**

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other information that we might give you from time to time about how we collect and use your personal data.

This Privacy Notice applies from 25 May 2018, when the General Data Protection Regulation comes into force. We may update this Privacy Notice at any time.

#### Who is the data controller?

Anita Davenport-Brooks, Group HR, Health and Safety Manager, <a href="mailto:anita.davenport-brooks@lander.co.uk">anita.davenport-brooks@lander.co.uk</a> contact number 01212513289, is the "controller" for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

This Privacy Notice also covers how Lander Holdings and Lander Intech uses any personal data about you that we share with them for purposes of conducting business with you. Anita Davenport-Brooks, Group Health and Safety Manager, <a href="mailto:anita.davenport-brooks@lander.co.uk">anita.davenport-brooks@lander.co.uk</a> is the controller of any personal data the business may hold and use about you in relation to conducting business with you. They also act as your first point of contact if you have any questions or concerns about data protection. Lander Holdings and Lander Intech apply the same high standards to data protection compliance as we do.

## What type of personal data we may request from you.

Personal data means any information relating to a living individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, email address, photographs for ID purposes, Contact information such as residential address, telephone numbers). It can be factual (e.g. contact details or date of birth), an opinion about an individual's actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

We may request, hold and use various types of personal data about you, including (but not limited to), for example: CCTV footage; photographs, name, email address, photographs for ID purposes, contact information such as residential address, telephone numbers, information we may learn from you or be given by you such as transactions, any advice or recommendations, meeting minutes, log of meetings, complaints, as well as email exchanges. This list is not exhaustive, and we may periodically require additional information to satisfy our legal and regulatory obligations. Where additional information is required we will provide you with a reasonable explanation of why it is required unless we are prevented from doings so by law.

### Why do we hold your personal data and on what legal grounds?

We hold and use your ordinary personal data for legitimate business purposes only and where we have a lawful purpose to do so. This may include but is not limited to, for example:

- performance of day-to-day business activities
- shareholder in one of the companies with which we have a trading agreement
- consent to receiving communications from us
- have a contractual business agreement with us
- request resources or services from us
- are actively receiving services or products from us under a contractual arrangement or engagement
- give us feedback, or some other form of legitimate business interest with you.

Data protection law specifies the legal grounds on which we can hold and use personal data. We only use your personal data to perform our duties under contracts we may have with you or where it is necessary for our legitimate interests (or those of a third party). Your interests and fundamental rights do not override those interests.

Occasionally, we may also hold and use ordinary personal data: in the public interest for the detection or prevention of crime; or to establish, exercise or defend a legal claim; where needed to protect our or your interests (or someone else's interests) where you have already made the information public.

Sometimes we may use your personal data for purposes that are different from or incompatible with those for which we collected it. If we do this, we will notify you and explain our legal ground for using your data in this way, as required under data protection law.

# How do we collect your personal data?

You provide us with most of the personal data about you that we hold and use. Other personal data about you we hold and use is generated by you in the course of carrying out business with us. For example, during email correspondence or when producing documents or when you are on site such as CCTV, photography (special events, visits).

Some of the personal data we hold and use about you is provided by or generated from internal sources during the course of running our business. For example, colleagues may refer to you in emails or documents as part of our business and operational requirements.

Some of the personal data about you that we hold and use may come from external sources. For example: we may obtain information about you from publicly available sources such as your LinkedIn profile or other media sources; other customers or suppliers may give feedback about you; we might seek advice from a professional adviser that includes information about you in particular situations.

### If you give us someone else's personal data

Sometimes, you might provide us with another person's personal data – e.g. details of business contacts. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

## Who do we share your personal data with?

We will only share your personal data with third parties where we have an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information such as other companies in our group, professional advisers including but not limited to bankers, auditors, HMRC, lawyers, insurers who provide consultancy, banking and legal services, fraud prevention agencies, where it is necessary in our legitimate interest.

## International transfer of personal data

Our international offices in India, Slovakia and France will have access to your information for example email addresses and contact numbers for business purposes only.

# Security of your data

We have reviewed our security measures and have put in place adequate, proportionate and appropriate security measures as is required of an authorised organisation to prevent your personal data from being accidentally, used, lost or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

# How long will we keep your personal data?

We will not keep your personal data for longer than we need it for our legitimate business purposes.

We take into account the following criteria when determining the appropriate retention period for personal data:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes

- how long the personal data is likely to remain accurate and up-to-date
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

Given the variety of personal data that we use and the varying circumstances in which we use it, it is difficult to specify ahead of time precisely how long we will keep particular items of personal data. We will always keep your personal data for so long as we are required to do so under legal, accounting, reporting or regulatory requirements.

#### Accurate data

We will make all reasonable efforts to ensure that the data we hold on you is accurate and up to date. We will also correct any inaccuracies that we are made aware of. Your assistance in complying with our obligations is key and it would be appreciated by letting us know of any changes in relation to the data we hold about you, as it is important that the information we hold about you is accurate and up to date. Please email the 'Data Controller' detailed below.

### Your rights

You have a number of legal rights relating to your personal data, which are outlined here:

- The right to make a subject access request. This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- The right to request that we correct incomplete or inaccurate personal data that we hold about you.
- The right to request that we delete or remove personal data that we hold about you where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing.
- The right to object to our processing your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing
- The right to request that we restrict our processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- The right to request that we transfer your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to "data portability").

If you would like to exercise any of the above rights or have any questions or concerns about how your personal data is being used by us, please contact Anita Davenport-Brooks, Group HR, Health and Safety Manager,

<u>anita.davenport-brooks@lander.co.uk</u> in writing. Note that these rights are not absolute and in some circumstances we may be entitled to refuse some or all of your request.

If you have any questions or concerns about how your personal data is being used by Lander Intech or Lander Holdings Ltd you can contact Anita Davenport-Brooks, Group HR, Health and Safety Manager, <a href="mailto:anita.davenport-brooks@lander.co.uk">anita.davenport-brooks@lander.co.uk</a>.

Note too that you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <a href="https://ico.org.uk">https://ico.org.uk</a>

# **Authorisation/Acceptance**

By reading this privacy notice it is deemed that you have understood it and are in agreement with Lander Automotive Ltd, Lander Intech and Lander Holdings Ltd using your information for the sole purpose of its day to day trading only. You are not required to do anything unless you wish for your data to be removed. If you DO NOT wish for us to use your information please reply by Email to: <a href="mailto:anita.davenport-brooks@lander.co.uk">anita.davenport-brooks@lander.co.uk</a>. With the subject header GDPR OPT OUT. We will review all applicable information from our database prior to removal. We may contact you if we have any concerns related to the impact of doing business with you and discuss these.

#### Cookies we use on our website

We use cloudflare (\_cfdruid) security cookies, it does not correspond to any user ID or store any personally identifiable information. We also use lang to help us to determine the language settings of the user's browser, to better serve relevant information in the right language. We do not store any personally identifiable information through this cookie.

# Updates to our website privacy notice

This policy may be updated periodically and without prior notice. We will post a notice on our website to notify you of any significant changes to our privacy notice.