

# Client Privacy Notice

## The Controller - Who we are:

Ballyvesey Holdings Limited. Please consult document "Trading Companies" for individual entities.

## Data Protection:

Data Protection in the Ballyvesey Divisions is administered by the GDPR Steering Committee.

- James Darragh (Compliance & HR)
- Gordon Willis (ICT)
- David Andrews (Chief Information Officer)

All members of the GDPR Steering Committee have received training on data protection and information security relating specifically to their responsibilities. In addition, at least one member of the Steering Committee holds a General Data Protection Regulations Practitioner Certificate.

The Steering Committee can be contacted by emailing: [dataprotection@ballyvesey.com](mailto:dataprotection@ballyvesey.com)

Or, alternatively by writing to:

Data Protection, Ballyvesey Holdings Limited, 607 Antrim Road, Newtownabbey, BT36 4RF

## Categories of Data Collected:

To provide a service to our customers it is necessary to collect data. The data we collect may include, Public Data, Company Data, Third Party Data and Personal Data. Personal Data is protected in law by the General Data Protection Regulations 2018 and UK Data Protection Act 2018.

## Processing of Data:

Client & third party data is collected if required to carry out the reasonable instructions of the client in the performance of the legitimate business interests of the divisions of Ballyvesey Holdings Limited. Client and or Third Party data may also be collected to meet any legal obligation place upon the controller by a statutory provision. These purposes may include, but are not limited to, the raising of orders, invoices and accountable record keeping, to produce revenue in the interests of the business, statutory taxation, prevention of fraud and criminal offences and protecting the company assets and revenues.

## Who will receive the data:

In most cases the data will only be processed by the Group Company engaged by the client in the course of their business operations. For accountable record keeping and statutory obligations, some data may be shared throughout other parts of Ballyvesey Holdings Limited wherein they process parts of the data on behalf of their subsidiaries. Data will only be provided to third parties where there is a legal obligation to do so, or the client requires us, in order to fulfil their operational requirements. Information may be provided to a Credit Reference Bureau when processing a credit history check.

### **International Transfer:**

Ballyvesey Holdings Limited, on rare occasions may be legally obliged to provide some information to other countries within EEA, such as Republic of Ireland etc. for border / custom controls and inter-state taxation. No data is transferred out of EEA at this time, if we facilitate a client request which requires this, we will discuss those obligations at that time.

### **Retention Period:**

In order to comply with the legal obligations of statutory provisions for taxation we will retain relevant records for a period of seven years. In doing this we will practice data minimisation and only retain the actual data we will need to meet this requirement.

### **Your Rights:**

Ballyvesey Holdings Limited undertakes to protect the rights and freedoms of all individuals whose data we process. We will uphold the principles in Article 5 of the General Data Protection Regulations, as directed by European Court of Justice and when applicable the rights provided under statute by any Act of the United Kingdom's Parliament having gained Royal Assent from the Data Protection Bill 2018. We respect any individual's right to:

- Submit a Subject Access Request for their personal data
- Request correction and/or deletion of inaccurate or incorrect personal data
- Object to our processing of their personal data, if our processing is not lawful, fair, nor transparent
- Have us explain to you the impact of failing to provide, withdrawing consent, or objecting to our processing of your personal data and the effects that may have

If you are still not satisfied that we have dealt with any complaint regarding your personal data, in a comprehensive and professional manner, you have the right to complain to the Information Commissioner's Office (ICO).

### **Automated Systems:**

To protect the legitimate business interests of Ballyvesey Holdings, the results of a credit history check may be determined by automated decision making processes provided by the Credit Reference Bureau. If you disagree with the result, you can request that we humanly review that decision. Price comparison and limited customer profiling processes may be used to determine the best value for our customers and to maintain competitiveness in the market. We will endeavour to inform you as and when any further automated processes, other than those already stated, are used within the operation parameters of our business.

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