



## **PRIVACY POLICY**

### **Introduction**

This Privacy Policy sets out how Nugent Engineering Ltd uses and protects any information that you provide.

Nugent Engineering Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy statement.

Nugent Engineering Ltd may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 18/12/2018.

### **Who we are**

You can contact the Data Protection Officer by mail at Nugent Engineering Ltd, 15 Aghnagar Road, Galbally, Co. Tyrone, BT70 2PP or email [info@nugentengineering.com](mailto:info@nugentengineering.com)

What information do we collect?

We may collect the following information from our website:

- Name
- Contact information including email address
- Demographic information such as postcode, preferences and interests
- Other information relevant to customer surveys and/or offers

We collect and process personal data about you when you interact with us, purchase goods and services from us, register a trailer with us, or make an application for employment with us. The personal data we process includes:

- Your payment and delivery details, including billing and delivery addresses and credit/debit card details, where you make purchases from us
- CCTV footage whilst you are on any Nugent Engineering Ltd premises
- And/or any other information you provide

### **How we use personal information**

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping. Your personal information will be stored in our secure company database.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.

## **What legal basis we have for processing your personal data**

### 1. Supplying our products and providing our services

It is necessary for us to use personal information about you to enter into and perform the contracts that we make with you, such as when you become a customer. Using your information in this context is necessary so that we can:

- Provide you with information about the products and services
- Contact you for the purpose of sales enquiries and sales
- Carry out our obligations arising from any contract that we have with you
- Verify your identity
- Deal with any complaints you may have
- Contact you about any changes that we make to our products, services or organisation
- Administer our website, including troubleshooting problems, analysing statistics, conducting research and tests and keeping the site secure

### 2. Telling you about products or services that we think may be of interest to you

We may use your information to identify and tell you about events and our products or services that we think may be of interest to you. We will only do this where you have informed us that you would like to receive marketing communications.

If we do contact you about market research you do not have to participate. If you tell us that you do not want to receive market research communications, we will respect this.

Whether you chose to receive marketing communications or market research communications is up to you. You can choose to receive both, none, or just one or the other. Your choice will not affect any products or services that you have purchased from us, nor will it affect any quotes for products or services you buy in future.

You can update your preferences by using the links in any of our emails, or by getting in touch with us using our website.

### 3. Contacting you

We want to stay in touch with you. Sometimes we may need to use the information that we have about you in order to respond to your questions or let you know about important changes. We will only use your information in this respect where it is necessary so that we can:

- Interact and respond to any communications you send us, including where you use the Contact Us section, and any social media posts that you tag us in
- Let you know about any important changes to our business or policies

### 4. Verifying your identity

We may use your information where it is necessary for us to do so in order to meet our legal obligations or to detect and prevent fraud, money-laundering and other crimes.

### 5. Protecting you and others from harm

We may use your information where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality such as identity theft, piracy or fraud.

We need all the categories of information listed above to allow us:

- To provide our services to you;
- To enable us to comply with legal obligations; and
- To pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests).

The situations in which we will process your personal data are listed set out in the table below and indicate the purpose or purposes for which we are processing or will process your personal information.

### **When we share personal data**

We may share your personal data with third-parties including our professional advisors such as our external legal and financial advisors and with our distributors.

There are certain exceptional circumstances in which we may disclose your information to third-parties. This would be where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings
- Necessary to protect the safety of our employees, our property or the public
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Where we store and process personal data**

The personal data that we collect from you is stored on our own secure servers and secure document filing systems, and will not be transferred or stored outside the European Economic Area (EEA).

All information you provide to us is stored on our/third party secure servers.

### **How we secure personal data**

We are committed to ensuring that your information is secure, and in order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

We try to ensure that all information you provide to us is transferred securely via the website. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **How long we keep your personal data for**

We will not keep your personal information for any purpose for longer than is necessary and we will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud or enforce our terms and conditions.

For job applicants we will keep the personal data connected to your job application (including any interview records) indefinitely, or for as long as we believe this is in your and our best interests.

#### Your rights in relation to personal data

##### 1. You have the right to be informed.

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to do just that, but if you have any questions or require more specific information, you can get in touch using Contact Us section of the website.

##### 2. You have the right to access your personal data

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your information
- What categories of information we were using
- Who we have shared the information with
- How long we envisage holding your information

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold.

The first copy of your information that you request from us will be provided free of charge, if you require further copies we may charge an administrative fee to cover our costs.

##### 3. You have the right to correct any inaccurate or incomplete personal data.

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case you can contact us so that we can correct our records.

##### 4. You have the right to be forgotten

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it)
- You object to us using your information and we have no overriding reason to keep using it
- We have used your information unlawfully
- We are subject to a legal requirement to delete your information

In those situations, you have the right to have your personal data deleted. If you believe one of these situations applies to you, please get in touch using our website.

##### 5. You have the right to have a copy of your data transferred to you or a third party in a compatible format

Also known as data portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

If you would like us to transfer a copy of your data to you or another organisation in a structured, commonly used and machine-readable format, please contact us. There is no charge for you exercising this right.

#### 6. You have the right to object to direct marketing

You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please contact us or use the links provided in any of our marketing communications, and we will stop sending direct marketing.

#### 7. You have the right to object to us using your information for our own legitimate interests

Sometimes, we use your personal information to achieve goals that will help us as well as you. This includes:

- When we tell you about services, products or events that are similar to ones that you have already engaged with, bought or attended
- When we use your information to help us make our business better
- When we contact you to interact, communicate or let you know about changes we are making

We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

In order to exercise your right to object to our use of your data for the purposes above, please contact us.

#### 8. You have the right to restrict how we use your personal data

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the information we hold about you is inaccurate, and we have not yet been able to verify this
- You have objected to us using your information for our own legitimate interests and we are in the process of considering your objection
- We have used your information in an unlawful way, but you do not want us to delete your data
- We no longer need to use the information, but you need it for a legal claim

If you believe any of these situations apply, please contact us.

### **How to contact us**

Should you have any queries regarding this privacy notice, about Nugent Engineering Ltd processing of your personal data or wish to exercise your rights you can contact our Data Protection Officer using this email address: [info@nugentengineering.com](mailto:info@nugentengineering.com)

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>