

CHAINS LIMITED

PRIVACY NOTICE FOR CUSTOMERS

1. Background

On 25th May 2018 a new law came into place. It is known as the General Data Protection Regulation (GDPRs). There is a lot of jargon used within the GDPRs, but basically this is about how personal information about individuals is collected, used and looked after. There are other regulations called the Privacy and Electronic Communication Regulations (PECRs) which address how information concerning companies is processed. This document sets out the details about how the personal information provided by you will be used and looked after and explains your rights in relation to it. For our business personal information is typically contact details of individuals within companies with whom we deal or who are responsible for purchasing decisions about the type of equipment which we supply. The laws have again been updated since the UK withdrawal from the EU on the 1st January 2021. These guidelines are now known and covered in Ireland as – Ireland GDPR and they sit alongside existing legislation of the Data Protection Act 2018 . They are enforced by The Data Protection Commission.

2. Our Commitment To You

Our commitment is to:-

- Keep personal information provided by you safe and private;
- Not use personal information for any purposes other than in connection with undertaking work for you, for the effective running of our business, for account management purposes, keeping you informed of information about our business and as otherwise set out in this document;
- Make it easy for you to approach us if you have any concerns or questions relating to the holding of personal information.

3. Who we are and how we operate

Chains Limited is a leading Irish supplier and installer of all forms of lifting equipment and provides a number of safety related services to a variety of industries including on-site and in-house thorough examination

There is more information about us on our website

<http://www.chains.ie>

The individual responsible for data protection matters at Chains Limited is Sandra Kinsella whose email address is: sandra@chains.ie

4. How information is collected from you

We will often collect personal information directly from you. This will often be when we are dealing with your questions about the services which we can provide or the products which we supply or when we start trading with you. Further personal information may be collected whilst work proceeds. Information may be collected by face-to-face meetings, by telephone, by email or other electronic communications or from information which you provide to us via our website.

Sometimes we may be given personal information by others with whom we are in contact and who indicate that your business may have a need for our products or services.

Please ensure that all personal information which you provide is accurately given to us as the information which is held is only as accurate as the information provided in the first place.

5. What personal information will we collect?

We will require contact details such as:-

- Name;
- Address;
- Telephone number;
- Email address.

We will also collect such personal information as we may reasonably require from you in order to provide goods or services to you.

6. Who will personal information be provided to?

We will not provide your personal information to anyone else save in the circumstances set out at 7 and 8 below or where you consent to us doing so.

7. What about outsourcing?

We will pass personal information to other organisations from time to time, not for them to use for their own benefit but rather to assist us. This might include holding personal information by others on our behalf in electronic form, to assist with efficient administration and running of Chains Limited, for the purposes of creating and maintaining databases and customer relationship management.

8. What will the personal information be used for?

- To fulfil our contractual obligations towards you:-
 - To progress the supply of goods or services to you;
 - ○ To regulate the quality of what we do on your behalf;
 - We may from time to time provide personal information to those outside of Chains Limited to assist us in providing products and services to you. For

example, we may need to provide personal information when organising the supply of equipment from other suppliers.

· **To ensure vital interests:-**

It is not likely that we will use personal information for these purposes. This will only apply if we have information about your health and a medical emergency arises, such information may then be used to ensure your health and safety.

· **When it is our legal obligation**

There is a requirement for us to keep records for VAT and other financial and regulatory purposes. Also, in very rare circumstances we may be required to provide information to local or public authorities including the An Garda Siochana.

· **When legitimate interests apply**

It is possible that from time to time we may wish to communicate with you concerning matters which may be of interest to you. The nature of such contact will be:-

- To inform you of any changes to our products or services;
- To provide you with news in our field of operation which may be of interest or relevance to you;

- To communicate about offers and promotions, product launches or other developments of a similar nature:
- ○ To communicate other developments at Chains Limited.

We will not communicate to you under this heading where there is any perceived detriment to you in receiving the communication.

If you do not wish to receive communications under this heading please contact Sandra Kinsella. In making contact please confirm the type of communications listed which you do not wish to receive. In almost all circumstances we will then cease to send communications to you of this nature. However, if for some reason we propose to continue to provide communications to you of the particular nature we will explain to you why we propose to do so and enter into a dialogue with you about this.

· **When you consent**

There are certain uses to which we will not put personal information without your specific consent. For example, we will not provide any information about you in publicity material without your consent. If we wish to use your personal information for any purpose other than those listed under the other heads we will seek your specific consent.

- **Other**

We may also use personal information for management and statistical purposes to enable the efficient running of Chains Limited.

9. **What happens if I don't wish to provide personal information to Chains Limited?**

We seek personal information for the purposes set out above. The information is primarily required to enable us to trade with you and is of the nature of contact details. Without such information we are not likely to be in a position to trade with you. If, of course, we have personal information relating to you and you have no wish to deal with us, please let us know as we would not wish to contact you or retain personal information about you unnecessarily.

10. **How long will Chains Limited keep personal information for?**

We will only retain personal information:-

- For as long as necessary to fulfil the purposes it was collected for as set out in this Privacy Notice;
- In relation to those who enquire about our products and services but do not go on to purchase them or who we are told may have an interest in our products or services but do not go on to purchase them, we would not normally keep personal information for longer than 2 years after the year of the last communication from you, or where we do

not receive a communication from you for longer than 2 years after the year of our initial contact;

- Concerning the supply of goods or services to you for a period following conclusion of the supply. This will be 7 years or in cases where the lifespan of the product is longer, the lifespan of the product. This longer period is for product safety reasons.
- In some circumstances you have the right to request erasure of personal information held. This will be addressed below.

11. Your rights in relation to the information held in relation to you

- **Access** - the right to make what is known as a Subject Access Request to obtain a copy of the personal information which we hold about you. If you make such a request we are required, in most circumstances, to provide a copy of the personal information without charge and within 30 days.

You may also seek confirmation of the nature of personal information which we hold about you without seeking a copy of the information itself.

- **Correction** – it is important that you keep us up to date with any changes to the personal information provided. Subject to that you have the right to ask us to correct or complete any inaccurate or incomplete data held about you. It is possible that

evidence will be required of the new information provided.

- **Erasure** – you are entitled to ask us to delete or remove personal information held where there is no good reason for us to continue to hold it. It may not always be possible to comply with your request due to ongoing obligations in relation to the personal information. Where this is the case you will be informed and be told of the reasons why it is not possible to comply with the request.
- **Object to processing** – you may object to us processing personal information. There are some circumstances in which it will not be possible to comply with your request, for example if it is necessary to process the information in connection with obligations which we have and which have been explained to you in this document. If you object to us processing information which has been processed under the legitimate interest head, we will stop processing it.
- **Restriction of processing** – you may ask us to suspend processing of personal information in the following situations:-
 - If you want the data accuracy to be established;
 - Where the use of the personal information is unlawful but you do not want it to be erased;

- You need the data to be held even though we no longer require it as you need it to establish, exercise, or defend legal claims; or
- You have objected to the use of the data by us but we need time to determine whether we have overriding legitimate grounds to process it.
- **Request the transfer of information** – sometimes rights apply to request a transfer of personal information held to other organisations, such as other suppliers of similar products. This right only applies to personal information that is processed by automated means and is held because it was necessary for the performance of the contract with you or personal information which is processed on the basis of your consent.

12. **Keeping personal information safe**

We have put in place appropriate security measures to prevent the personal information provided from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to personal information is limited to those employees and contractors who have a business need to know the personal information. Personal information will only be processed upon instructions from ourselves. Procedures have been put in place to deal with any suspected breach of the requirements under the

GDPRs. You and/or the Regulator referred to below will be notified of any potentially significant breach.

13. IP Addresses

An IP address is a number automatically assigned to your computer whenever you access the Internet. All computer identification on the Internet is conducted with IP addresses, which allow computers and servers to recognise and communicate with each other. We do log IP addresses, or the location of your computer on the Internet, for systems administration and troubleshooting purposes. However, we do not use IP address logs to track your session or your behaviour on a website or application.

14. What benefits do I receive from cookies?

Overall, the use of cookies helps to give you a customised experience on websites. Through the use of cookies, we will know what's working and what's not. That information is then used to keep our websites fresh and relevant to you the user. Cookies also allow the personalisation of any online services we may provide to you.

15. May I decline to accept a cookie?

You may decline to accept cookies by selecting an option on your browser to reject cookies or by clicking in a cookie warning notice when you visit a site. Other sites linked to the site may also send cookies; however we do not control such activities. If you decline a cookie, you may not be viewing a site in a way in which it was designed to be optimally presented.

16. **What happens if you want to complain?**

It is hoped that you will not have cause to complain. If you do complaints should be referred to Sandra Kinsella in the first place where possible. In the event that it is not possible or appropriate to refer a complaint to Sandra Kinsella it may be referred to the Regulator, the Data Protection Commissioner's Office (DPC) whose address is:-

Data Protection Commission
21 Fitzwillaim Square South,
Dublin 2
D02 RD28

17. **Miscellaneous** · It is not anticipated that any

personal information will be transferred outside of the European Union. We will notify you if this position changes.

- We don't anticipate using automated decision making in relation to the personal information provided.

18. **If I have any questions who do I ask?**

Please ask the individual with responsibility for dealing with your matter. If this person cannot help, or if it is inappropriate to contact him or her, then please contact Sandra Kinsella.

Dated 13 May 2022