

GDPR Privacy Notice for Skyjack UK Limited Customers

1. What is the purpose of this document?

Skyjack UK Limited is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your contract with us in accordance with the General Data Protection Regulation (GDPR). It applies to all customers.

Skyjack UK Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former customers. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Gender.

- Transaction data including details of payments to and from you during the course of your matter including in respect of payment of our fees and any third party disbursements we have paid on your behalf
- Information specifically relating to the matter in which you instruct us or given by you to us in respect of the background of that matter

4. How is your personal information collected?

We collect personal information about customers through correspondence (including letters, faxes emails and texts) telephone calls and the contract process, either directly from you or sometimes from another individual if specifically agreed to by you.

We may collect additional personal information in the course of the contract related to the work for which our services are retained throughout the period of the contract.

5. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

- We need all the categories of information in the list above (see paragraph 3) primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations. In some cases we may use your personal information 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 information are listed below.
- Making a decision about the terms of our contract with you.
- Determining the terms upon which we deal with our contractual obligations with you.
- Corresponding with third parties including Financial Institutions, Banks, Asset Finance Businesses and / or leasing companies, you, as the customer, have instructed us to engage with on your behalf.
- Charging you and applying VAT.
- Preparing documents necessary for the pursuance of the contract.
- Administering the contract we have entered into with you.
- Making arrangements for the termination of your contract.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as completing your contract), we may be prevented from complying with our legal obligations such as to provide appropriate information to a regulatory body.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Data sharing

We may have to share your data with third parties, including financial institutions, insurance brokers and Skyjack Inc. of 55 Campbell Road, Guelph, Ontario, Canada, N1H 1B9.

We require third parties to respect the security of your data and to treat it in accordance with the law.

In respect of Skyjack Inc. Data Protection law restricts transfers of personal data to countries outside of the European Economic Area (EEA) because the law in those countries might not provide the same level of protection to personal data as the law in the EEA. To ensure the level of protection afforded to personal data is not compromised, therefore, we are only able to transfer your personal data outside the EEA if certain conditions are met.

We may transfer some of your personal data to Skyjack Inc. There is an adequacy decision by the European Commission in respect of Canada. This means that Canada is deemed to provide an adequate level of protection for your personal data.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to deal with the contract with you in your best interests or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers for example lenders, insurance brokers, Financial Institutions, Banks, Asset Finance Businesses and / or leasing companies. The activities carried out by third-party service providers are providing services or products which are necessary for the performance of the contract with you.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. Data security

We have put in place measures to protect the security of your information. Details of these measures are available on our website. www.skyjack.com. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those lenders, insurance brokers, Financial Institutions, Banks, Asset Finance Businesses and / or leasing companies. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements.

9. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your retainer with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below). Please note however that we do normally need to retain client files for the reasons set out in clause 9 above, and our need to do this may allow us to reject your request for erasure.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Charlie Patterson in writing on cpatterson@skyjackeurope.co.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to obtain access to the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

10. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Please note that in the majority of cases, we will rely on a contractual right to process your personal information however, rather than your specific consent. Therefore the effect of you withdrawing consent to processing may not mean we are no longer entitled to process your data, as we may still be entitled to do so under contract. To withdraw your consent, please contact Charlie Patterson in the first instance. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11. Data protection officer

We have appointed Data Protection Officer (currently Charlie Patterson) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer. You have the right to make a complaint concerning your personal data at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

12. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact Charlie Patterson in the first instance.