

TRB LIMITED.

PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY

1. OUR PRIVACY STATEMENT

The protection of your personal data is of great importance to **TRB Limited (“Company”)**. This privacy policy (**the “Privacy Policy”**) explains what, how and why, the Company, acting as data controller, collects and processes the personal data that you submit or disclose to us. It also explains how we will store this information and keep it safe.

We process this personal data in accordance with the applicable EU and Member State regulations on data protection in particular, the General Data Protection Regulation No 2016/679 (the “GDPR”).

We encourage you to read this Privacy Policy carefully. If you do not wish your personal data to be used by us as set out in this Privacy Policy, please do not provide us with your personal data.

If you have any queries or comments relating to this Privacy Policy, please contact admin@trb-ltd.co.uk or telephone +44 01745 584000

2. HOW DO WE USE YOUR PERSONAL DATA?

We will always process your personal data based on one of the legal basis provided for in the GDPR (Articles 6 and 7). In addition, we will always process your sensitive personal data, for example, health condition, in accordance with the special rules provided for in the GDPR (Articles 9 and 10).

We may collect and process your personal data for the purposes detailed below, which are required so that we can pursue our legitimate interests and provide you with adequate services and products (Article 6(1)(f) GDPR):

- to inform you about our purchasing policies and business terms;

- to promote safety and security, such as by monitoring fraud and investigating suspicious or potentially illegal activity or violations of our terms or policies;
- to manage our contractual relationship with you;
- to ensure business continuity;

We may also collect and process your personal data for the purposes detailed below, which are required so that we can engage in an employment relationship with you provide you with comprehensive terms and conditions of employment (Article 6(1)(b) GDPR), also pursuant with the applicable employment laws (Article 6(1)(c) GDPR):

- to manage our employment contractual relationship with you;
- to notify you about changes to your terms and conditions of employment (salary changes, promotions, working hours, holiday entitlements etc.).
- to uphold our legal and employment responsibilities to you.

Where required by the law, we may also request your consent to process certain of your personal data for certain specific purposes (Article 6(1)(a) and 9(2)(a) GDPR). In these situations, please be aware that you are entitled to withdraw your consent at any time, and this without affecting the lawfulness of processing based on your consent before withdrawal thereof.

We will process your data for these specified, explicit and legitimate purposes, and will not further process the data in a way that is incompatible with these purposes. If we intend to process personal data originally collected for one purpose in order to attain other objectives or purposes, we will ensure that you are informed of this and that your consent is sought. We will keep your personal data only as long as it is necessary for us to comply with our legal and employment obligations, to ensure that we provide an adequate service, and to support the business activities of the Company (Article 5 and 25(2) GDPR).

3. WHAT TYPES OF PERSONAL DATA DO WE USE?

For the purposes specified under this Privacy Policy, we process the personal data obtained from you directly, when you decide to communicate such data to us, i.e., when you contact us, or when you fill in any of our forms or indirectly (data provided to us by a third-party). We ensure that the personal data processed be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

4. HOW DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with the Company's parent company and its affiliates in the European Economic Area, and with third parties in accordance with the GDPR. Where we share your data with a data processor, we will put the appropriate legal framework in place in order to cover such transfer and processing (Articles 26, 28 and 29). Furthermore, where we share your data with any entity outside the EEA, we will put appropriate legal frameworks in place, notably controller-to-controller (2004/915/EC) and controller-to-processor (2010/87/EU) Standard Contract Clauses approved by the European Commission, in order to cover such transfers (Articles 44 ff. GDPR).

Service Providers

We may share the personal data of employees with companies which provide services on our behalf.

Legal Compliance and Security

It may be necessary for us – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – to disclose your personal data. We may also disclose your personal data if we determine that, due to purposes of national security, law enforcement, or other issues of public importance, the disclosure is necessary or appropriate.

5. OUR RECORDS OF DATA PROCESSES

We handle records of all processing of personal data in accordance with the obligations established by the GDPR (Article 30), both where we might act as a controller or as a processor. In these records, we reflect all the information necessary in order to comply with the GDPR and cooperate with the supervisory authorities as required (Article 31).

6. SECURITY MEASURES

We process your personal data in a manner that ensures their appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage. We use appropriate technical or organisational measures to achieve this level of protection (Article 25(1) and 32 GDPR).

We will retain your personal information for as long as it is necessary to fulfill the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

7. NOTIFICATION OF DATA BREACHES TO THE COMPETENT SUPERVISORY AUTHORITIES

In case of breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed, we have the mechanisms and policies in place in order to identify it and assess it promptly. Depending on the outcome of our assessment, we will make the requisite notifications to the supervisory authorities and communications to the affected data subjects, which might include you (Articles 33 and 34 GDPR).

8. PROCESSING LIKELY TO RESULT IN HIGH RISK TO YOUR RIGHTS AND FREEDOMS

We have mechanisms and policies in place in order to identify data processing activities that may result in high risk to your rights and freedoms (Article 35 of the GDPR). If any such data processing activity is identified, we will assess it internally and either stop it or ensure that the processing is compliant with the GDPR or that appropriate technical and organisational safeguards are in place in order to proceed with it.

In case of doubt, we will contact the competent Data Protection Supervisory Authority in order to obtain their advice and recommendations (Article 36 GDPR).

9. YOUR RIGHTS REGARDING YOUR PERSONAL DATA WE HOLD

You have the following rights regarding personal data collected and processed by us.

- **Transparency** – Information regarding your data processing: You have the right to obtain from us all the requisite information regarding our data processing activities that concern you (Articles 13 and 14 GDPR).
- **Access** – to the personal data we hold on you: You have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain related information (Article 15 GDPR).
- **Rectification** – the correction of personal data e.g. when the data held is incorrect, incomplete or out of date (Article 15 GDPR).
- **Erasure** - you can request the deletion or removal of personal data in specific circumstances e.g. where you have withdrawn consent to hold data, when certain legal conditions apply (Article 17 GDPR).
- **Restriction** – you can request that personal data can only be processed in certain circumstances, when certain legal conditions apply (Article 18 GDPR).
- **Objection** – you have a right to object to the processing of personal data concerning you based on legitimate interests or on grounds relating to your particular circumstances, when certain legal conditions apply (Article 21 GDPR).
- **Profiling** – you have a right not to be subject to automated decision making, including profiling based on the processing of your personal data, when certain conditions apply (Article 20 GDPR).

If you intend to exercise such rights, please refer to the contact section below.

If you are not satisfied with the way in which we have proceeded with any request, or if you have any complaint regarding the way in which we process your personal data, you may lodge a complaint with a Data Protection Supervisory Authority.

10. LINKS TO OTHER SITES

We may propose hypertext links from the Website to third-party websites or Internet sources. We do not control and cannot be held liable for third parties' privacy practices and content. Please read carefully their privacy policies to find out how they collect and process your personal data.

11. UPDATES TO PRIVACY POLICY

We may revise or update this Privacy Policy from time to time. Any changes to this Privacy Policy will become effective upon posting of the revised Privacy Policy. If we make changes which we believe are significant, we will inform you through our Website to the extent possible and seek your consent where applicable.

CONTACT

For any questions or requests relating to this Privacy Policy, you can contact us by email admin@trb-ltd.co.uk or telephone +44 01745 584000