

In this privacy policy we explain how we collect and use your personal information. This privacy policy applies to all personal data of individuals collected, used or processed by IMPACT FORK TRUCKS LTD in relation to our services, such as information you receive via our websites or information processed as part of the delivery of our products or services to you.

We have divided this privacy policy into different sections. Please read this privacy policy carefully by clicking on the relevant sections below for further information about our practices and your rights regarding your personal data.

Who we are

The types of personal data we process

How we collect your data

For which purposes we use your data

Disclosing or sharing data with third parties

Security and retention

International transfer of your data

Your rights

How we look after this policy

## **1. Who we are**

We are Impact Fork Trucks Ltd ('IMPACT FORK TRUCKS LTD'), registered office Citadel House, High Street, Hull, HU1 1QE (company number 2550150), United Kingdom. We are responsible for the processing of your personal data. IMPACT FORK TRUCKS LTD manages and controls the website, social media and the central customer database. The data controller is hereinafter referred to as "IMPACT FORK TRUCKS LTD" or "we". We can be reached via email at [gdpr@Impact-handling.com](mailto:gdpr@Impact-handling.com), or by phone at [+44(0) 115 946 0777]

IMPACT FORK TRUCKS LTD is an UK/Ireland trading company combining the strengths and heritage of some of the world's biggest names in engineering and technology.

It brings the materials handling and logistics markets a comprehensive range of state-of-the-art counterbalance and warehouse products, intelligent solutions and customer-focused services.

## **2. The types of personal data we process**

2.1. For the services we provide, we collect and process the following categories of personal data:

Information we collect from you.

When you register for one of our online services we collect identifying information about you, such as:

- The company you work for, your job title, your name, and other information we require for the specific service.
- Your phone number, email address, and other contact information.
- Your contact details may include your address, telephone number and email address, and other business contact details.

Information we collect from your use of our site.

With regard to each of your visits to our website, or use of one of our mobile apps and other digital media we collect the following information:

- We register your IP address, browser type, operating system, referring website, web-browsing behavior and app use.
- We also collect information via cookies and similar technologies when you visit our websites or use our mobile apps. For more information please read our cookie policy on the website or the mobile app you use.
- We may receive an automatic notification when you open our emails or click on a link in such emails.
- With your permission, we may also receive your location data.
- Information you share with us when you use one of our online services, such as on the IMPACT FORK TRUCKS LTD website. For example, your language and the time zone you live in.

Information we collect from our subsidiaries.

Where there has been business conducted with our subsidiaries we may receive your personal data.

Information we collect in relation to social media.

We are active on various social media platforms such as LinkedIn, Facebook, YouTube and Google Plus. If you communicate with us through social media (for example, if you follow our LinkedIn page or send a personal message to us), we receive, or we can access data about you. We only use this information to communicate with you and for statistical research (see below). We encourage you to review the privacy policy of the social media platform that you used to use to get more information about the processing of your personal data.

Information we collect from third parties.

Certain services are provided by us in co-operation with other companies (i.e. when we use recruitment agencies for acquiring new personnel). These companies share your personal data with us, if this is necessary for these services. We also share your personal information with these third parties (please see par. 'Disclosing or sharing data with third parties' below).

Our communication with you.

When you send us an email or communicate with us online or via social media, we register your communication

Information you choose to share with us

You may choose to share information with us, for example when you reply to one of our vacancies on the website and share your resume, fill out your email preferences, leave a comment for us on Facebook, or fill out a customer survey. We also collect the data you share with us via social media or online platforms, such as your opinions, your reviews on our products, your interests, or your familiarity with our brands.

2.2. For specific services, apps or events, we may collect other types of data and use such data for different purposes than described in this privacy policy. We will inform you about this when you register for the specific service, event or download the specific app.

### **3. For which purposes we use your data**

3.1. The main purposes for which we use your personal information are:

To provide our services to you, including the execution of any agreement with you, or the legal entity you represent.

For example, when you request information about our products or distributors or when you use one of our services, we process the data we need to fulfill your request. For example, we process the details about the company you work for, your (business) contact details, and order history.

For the subscription to our newsletters and marketing emails.

If we have collected your email-address during the course of business dealings with you or if you subscribed to our newsletter yourself, we use your email-address to send you these newsletters.

We will only contact you with direct marketing communications if you consent to us doing so. You can ask us to stop sending you marketing e-mails at any time by clicking unsubscribe or contacting us (please see below par. 'Your rights').

To communicate with you.

If you sent us enquiries or complaints, we process your data for responding to you and answer your enquiries.

For statistical research and general purposes.

We use automatic tools to perform statistical research into general trends regarding the use of our services, websites, apps and social media and the behavior and preferences of our customers and users.

Categories of data.

The information we use for our research includes your postal code and country of residence, technical information we receive if you visit one of our websites, the information we collect through cookies, the personal preferences and interests and information you share with us online or via social media. For our research we only use aggregated data that are disconnected from your name and email address. We use the aggregated research results to detect general trends in the use of our products, services and tools. This enables us to develop better products, services, tools and offerings, to provide more responsive customer service and to improve the design and content of our websites. For more information on cookies and similar technologies, please visit the cookie policy on our website.

Legal basis - our legitimate interests in using your personal data for statistical research.

We process your personal data for our legitimate interests to develop better services and offers for our customers, to improve our products, and to improve the design and content of our websites and mobile apps. In order to protect your privacy, we only use aggregated data that are disconnected from your name and email address. If you wish to receive the complete balancing test, please contact us via our contact data as stated below.

Right to object.

You have the right to object, on grounds relating to your situation, at any time to processing of your personal data for statistical research (please see below par. 'Your rights').

To facilitate your application to one of our vacancies.

When you apply to one of our vacancies we process the data you share with us, such as your motivation letter and resume.

For record keeping and to comply with statutory obligations.

We collect, store and use your data for internal business purposes, such as record keeping and to comply with our legal and fiscal obligations.

3.2. Legal basis.

We collect, use and store your personal data to provide services, the execution of an agreement, to comply with the legal obligations we are subject to, if necessary for our legitimate interests or the interests of a third party or based on your consent.

You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent, by adjusting your settings (if available) or by contacting us (please see par. 'Your rights' below).

If you refuse to provide personal data that we require for the performance of the contract or compliance with a legal obligation, we may not be able to provide all or parts of the services you have requested from us. For example, if you lose the order details of an order you placed in the past and refuse to provide information related to this order, we may not be able to provide you with a copy of the agreement because we are not able to find the order in our systems.

When we process your personal data for our legitimate interests or the interests of a third party, we have balanced these interests against your legitimate interests. Where necessary we have taken appropriate measures to limit implications and prevent unwarranted harm to you. Our legitimate interests may for example include security and safety purposes or to provide better services and offers to you. For more information on these interests, please see the purposes for which we process your personal data above. More information on the balancing tests we perform is available upon request. Where we process your personal data for our legitimate interests or the interests of a third party, you have the right to object at any time on grounds relating to your particular situation (please see par. "Your rights" below).

Where we process your personal data for a purpose other than that for which we collected it initially (and we rely on a legal basis other than consent or complying with legal obligations for this new purpose), we will ascertain whether processing for this new purpose is compatible with the purpose for which the personal data were initially collected. More information on this assessment is available upon request (please see par. Your rights below).

#### **4. Disclosing or sharing data with third parties**

4.1. General. As a rule we do not sell or share your personal data with anyone outside IMPACT FORK TRUCKS LTD. However, we do disclose or share data with the following categories of recipients for the following purposes.

##### Parent Company

When you use one of our services, it is possible that we share data with our parent company. For example, our parent company based in South Africa help and support our IT infrastructure, but in covered by a separate agreement/ confidentiality agreement.

For the support services we involve.

We use third parties to provide our services, such as IT suppliers, social network providers, marketing agencies, credit and charge card companies and anti-fraud screening service providers. All such third parties will be required to adequately safeguard your personal data and only process it in accordance with our instructions.

##### Co-operation with third parties.

For the provision of certain services, we co-operate with other companies such as dealers and suppliers. In the course of providing these services to you, we share your data with them. Please be aware that the companies we co-operate with, often also have their own privacy policies. For information on how these companies use your personal data, please see their privacy policies.

##### Statistical research.

For statistical research we make use of third-party software such as Google Analytics, Lead Forensic or social media platforms. These platforms also have access to the data they collect. For example, when you accept cookies for our website, we analyze cookie data for statistical research via Google Analytics.

Ownership of IMPACT FORK TRUCKS LTD changes.

If ownership of IMPACT FORK TRUCKS LTD changes as a result of a merger, acquisition, or a transfer, your personal data may be transferred to the successor entity.

4.2. Public authorities. If we are required to by law, we also collect and share your identifying information with public authorities or governmental organizations.

4.3. Third party websites. Our websites contain links to third-party websites; if you follow these links, you will exit our websites. While these third-party websites are selected with care, we cannot accept liability for the use of your personal data by these organizations. For more information, please consult the privacy statement of the website you are visiting (if such a statement is provided).

## **5. Security and retention**

5.1. IMPACT FORK TRUCKS LTD will ensure that your personal data are properly secured using appropriate technical and organizational measures, so that they are protected against unauthorized or unlawful use, alteration, unauthorized access or disclosure, accidental or wrongful destruction, and loss.

5.2. Your personal data will be retained for as long as required for the purposes described in this privacy policy or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

## **6. International transfer of your data**

6.1. IMPACT FORK TRUCKS LTD may transfer your personal data to countries other than your country of residence (including countries outside the European Economic Area). By way of example, this may occur during Impact providing your services or because our group companies, partners or service providers have operations in countries across the world. The laws of these countries may not afford the same level of protection to your personal data.

The European Commission has determined that certain countries outside the European Union offer an adequate level of data protection (see article 45 General Data Protection Regulation (GDPR)).

6.2. IMPACT FORK TRUCKS LTD will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable privacy laws. For transfers of personal data outside the European Economic Area, IMPACT FORK TRUCKS LTD will use Commission approved Standard Contractual Clauses as safeguards (see article 46 GDPR). Please contact us using the details at the end of the policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

## **7. Your rights**

7.1. You may contact IMPACT FORK TRUCKS LTD (please see below) to exercise any of the rights you are granted under applicable data protection laws, which includes (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data, (5) the right to data portability and (6) the right to object to processing.

Right to access.

You may ask us whether we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with

additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

Right to rectification.

You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

Right to erasure.

You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only finds place in certain cases, prescribed by law and listed under article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

Right to restriction of processing.

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continue storing your personal data. We will inform you before the restriction is lifted.

Right to data portability.

Your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible we will transmit your personal data directly to the other controller.

Right to object.

You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data. This only applies in case the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing (see par. 'Legal basis' above).

At any time and free of charge you can object to direct marketing purposes in case your personal data are processed for such purposes, which includes profiling purposes to the extent that it is related to such direct marketing. In case you exercise this right, we will no longer process your personal data for such purposes.

7.2. You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent, by adjusting your settings (if available) or by contacting us.

For more information on how you can withdraw your consent for cookies and similar technologies we use when you visit our websites or use our apps, please check the cookie policy on our website or in the app.

7.3. Under conditions we are entitled to deny or restrict your rights as described above. In any case, we will carefully assess whether such an exemption applies and inform you accordingly.

We may, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the processing of such data is necessary for compliance with legal obligations. The right to data portability, for example, does not apply in case the personal data was not provided by you or if we process the data not on the basis of your consent or for the performance of a contract.

7.4. If you would like to exercise your rights, please your request to IMPACT FORK TRUCKS LTD:

Gainsborough Business Park,  
Fields Farm Road,  
Long Eaton,  
Nottingham  
NG10 1PX  
gdpr@Impact-handling.com  
+44(0) 115 946 0777

7.5. You can change communication preferences and unsubscribe from our commercials emails and push notifications any time

You can unsubscribe from our newsletters, or any other commercial emails and mobile push notifications with updates any time by clicking the unsubscribe link in the email, by adjusting your communication preferences in your account (if available), by changing your smart phone settings (for mobile push notifications) or by contacting our Contact person.

7.6. You can also contact us at any time if you have any questions, remarks or complaints in relation to this privacy policy. However, if you have unresolved concerns you also have the right to complain to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. For further details see attached link <https://www.gov.uk/data-protection/make-a-complaint>

## **8. How we look after this policy**

8.1. This privacy policy was most recently amended on 13/06/2018 and replaces earlier versions. We may amend this privacy policy from time to time and will notify you of any substantive changes by posting the revised policy on this website or via our apps, prior to these changes taking effect.

## **9. Cookies**

The use of cookies and similar technology are used to distinguish you from other users of our site. This improves and facilitates good user experience with our site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <http://impact-handling.com/cookie-information/>.

We use the following cookies for the following purposes:

Strictly necessary cookies.

These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical/performance cookies.

They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies.

These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences.