

1 The Controller - Who we are

- 1.1 Ballyvesey Holdings Limited. See section 11 for a list of individual Trading Companies.

2 Data Protection

- 2.1 Data Protection in the Ballyvesey Business Units administered by the Data Protection Committee (DPC).

- James Darragh (BVH Board Member & Legal Advisor)
- Gordon Willis (Head of Security & Governance)
- David Andrews (Data Protection Policy & Legislation)
- Darren Ward (Head of IT)

- 2.2 All members of the DPC have received training on data protection, Cyber Security and information security relating specifically to their responsibilities. In addition, at least one of the members of the DPC, will hold, or be working towards a General Data Protection Regulations Practitioner Certificate and at least one will hold, or be working towards a Certified Information Security Manager (CISM) Certificate.

- 2.3 The DPC can be contacted by emailing dataprotection@ballyvesey.com or by writing to:

Data Protection
Ballyvesey Holdings Limited
607 Antrim Road
Mallusk
Newtownabbey
BT36 4RF

3 Categories of Data Collected

- 3.1 To engage in a business relationship with our suppliers it is necessary to collect data. The data we collect may include, Public Data, Company Data, Third Party Data and Personal Data. Personal Data is protected in law by the General Data Protection Regulations (EU 2016/679), the General Data Protection Regulations (UK 2020), and The Data Protection Act (UK 2018).

4 Processing of Data

- 4.1 Supplier & third party data is collected if required in the performance of our duties to meet the legitimate business interests of the divisions of Ballyvesey Holdings Limited. Supplier and or Third Party data may also be collected to meet any legal obligation place upon the controller by a statutory provision. These purposes may include, but are not limited to, the processing of orders, invoices and accountable record keeping, the requisition of goods and services, to satisfy in the interests of the business, statutory taxation, prevention of fraud, or criminal offences and protecting the company assets and revenues. All legal basis for processing personal data will meet the requirements of Article 6 of the General Data Protection Regulations.

5 Who will receive the data

- 5.1 In most cases the data will only be processed by the Business Unit engaging the supplier, in the course of their business operations. For accountable record keeping and statutory obligations, some data may be shared throughout other parts of Ballyvesey Holdings Limited wherein they process parts of the data on behalf of their subsidiaries. Data will only be provided to third parties where there is a legal obligation to do so, or the supplier requires us, in order to fulfil their operational requirements.

6 International Transfer

- 6.1 Ballyvesey Holdings Limited, on rare occasions may be legally obliged to provide some information to other countries within EEA for border / custom controls and inter-state taxation. No data is transferred out of EEA at this time, if we place a supplier order which requires this, we will discuss those obligations at that time. Some data may be processed on cloud based servers which have storage facilities outside the EEA, but the data is encrypted and protected by International Standard Contract Clauses and Treaties which prevent the data being accessed or further processed outside the EEA.

7 Retention Period

- 7.1 In order to comply with the legal obligations of statutory provisions for taxation we will retain relevant records for a period of seven years. In doing this we will practice data minimisation and only retain the actual data we will need to meet this requirement.

8 Your Rights

- 8.1 Ballyvesey Holdings Limited undertakes to protect the rights and freedoms of all individuals whose data we process. We will uphold the principles in Article 5 of the General Data Protection Regulations, and the rights provided under statute by any Act of the UK Government. We respect any individual's right to:
- Submit a Subject Access Request for their personal data (Article 15 GDPR)
 - Request correction and/or deletion of inaccurate or incorrect personal data (Article 16 GDPR)
 - Object to our processing of their personal data, if our processing is not lawful, fair, nor transparent (Article 18 GDPR)
 - Have us explain to you the impact of failing to provide, withdrawing consent, or objecting to our processing of your personal data and the effects that may have (Article 13 GDPR)
 - The right to request erasure of your data, if it has been collected in error, no longer needed, unnecessary, unlawfully processed, or obtained (Article 17).

- 8.2 If an individual is unhappy about the way the Data Protection Committee deal with their rights and freedoms, they can complain in writing to:

Chief Executive Officer
Ballyvesey Holdings Limited
607 Antrim Road
Mallusk
Newtownabbey
BT36 4RF

- 8.3 The Chief Executive Officer or his nominated deputy will conduct an investigation and review of the circumstances and advise them of the findings along with any recommended actions within one month.
- 8.4 If the individual is still unsatisfied with the response of the Chief Executive Officer, or in fact at any other prior stage of the process, they can submit a report to the Information Commissioner's Office.

9 Automated Systems

- 9.1 Price comparison and limited supplier profiling processes may be used to determine the best value for our customers and to maintain competitiveness in the market. We will endeavour to inform you as and when any further automated processes, other than those already stated, are used within the operation parameters of our business.

10 Biometric Data

- 10.1 CCTV is in use throughout various areas of Group property, to detect and assist in the prosecution of crime, security of the company assets and defence of legal claims. Individuals making deliveries on behalf of a supplier to our premises may be recorded by CCTV systems. Where this is taking place appropriate signage will be displayed.

11 Trading Companies

Ballyvesey Industries Limited
Ballyvesey Properties Limited
Ballycraigy UK Properties Limited
Montgomery Developments Limited
Montgomery Transport (Ireland) Limited
Montgomery Freight Management Limited
MTG Customs Limited
Sleator Plant Limited
Norwest Plant Limited

Construction Equipment Distribution Limited
t/a TDL Equipment
DGC Limited
Centurion Truck Rental Limited
Sapphire Vehicle Solutions Limited
Montracon Limited
Midlands Truck & Van Limited
Intercounty Truck & Van Limited
West Pennine Trucks Limited

Ballyvesey Holdings Limited
Ballycraigy Properties Limited
Mallusk Business Park Limited
Montgomery Transport Limited
Montgomery Distribution Limited
Montgomery Tank Services Limited
Major Freight Limited
Sleator Plant & Machinery (Ireland) Limited
Eurofleet Rental Limited t/a Contract Plant
Rental
Genesis Equipment Sales Limited

DMC Trailers Limited
Falcon Vehicle Solutions Limited
Rockmount Vehicle Maintenance Limited
Commercial Vehicle Auctions Limited
Midlands Warehousing Limited
Heathrow Truck Centre Limited

Document Control

The Data Protection Committee is the document owner and responsible for ensuring this policy remains current and up to date.

A current version of this document is available to all members of staff on the [Security and Governance SharePoint site](#) and is published by the Security and Governance function.

This policy was approved by the Data Protection Committee and is issued on a version controlled basis.

Representative of the DPC signature:



Date: 02/04/2024

Change History Record

Issue	Description of Change	Date of Change
1.0	Initial Issue	
2.0	Review	02/04/2024