

1 The Controller - Who we are

- 1.1 Ballyvesey Holdings Limited. See section 9 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 Employee personal email addresses.

4 Processing of Data

- 4.1 Divisions within Ballyvesey Holdings Limited currently processes email addresses under contract of employment to provide employees with an electronic payslip each time they are paid and other HR/Payroll relevant notices. Email payslips and receiving critical pay or HR Related material are contractually required under Terms and Conditions of Employment. Emails are also used for general broadcasts and bulletins to all employees, or selective groups of employees in relation to Group News Announcements, Training Documentation and other Human Resources material. On receipt of these types of communications, employees can opt out of consent-based broadcasts by using the provided link at the bottom of the email and changing their preferences. Communicating via email falls within the reasonable expectations of an employee, employer relationship and helps us remain environmentally friendly by consuming less paper, ink and electricity. In line with the Group's ESG strategy.

5 Who will receive the data

- 5.1 We will only disclose our employees' email addresses to third parties if we are legally obliged to do so or where we need to comply with our contractual duties, for instance we may need to pass on certain information to our payroll provider, pension or insurance schemes.
- 5.2 We may disclose employee email addresses to other group companies for purposes connected with employment matters, or the management of the company's business.
- 5.3 If in the future we intend to process employee's, or groups of employees' personal data for a purpose other than that which it was collected we will provide them with information on that purpose and any other relevant information.

6 Payroll, Workplace Pension, Insurance and Benefit Providers

- 6.1 Where we are legally obliged, contracted to, or in the legitimate business interests of the company, we may need to provide employees' personal data to third party payroll, pension, insurance or benefit providers (for example for payroll processing, auto enrolment, and health or liability insurance). When we introduce employees to these providers, who are third parties, they form a direct and separate relationship with our employees, as their own members. In doing so they will become controllers of that personal data, in their own right. The providers will be able to issue those members with their own Terms and Conditions, alongside their own Privacy Notices and Data Protection Policies. These disclosures will fall within the reasonable expectations of an employee, employer relationship, where obligations of the employer's duties may be met by a third party. Rights and Freedoms of Individuals protected by the General Data Protection Regulations, will still apply.

7 Retention Period

- 7.1 Emails will only be processed in relation to an active employee. Once an employee leaves, the business unit will endeavour to record this on our database within 28 days of your manager sending the business unit HR a leaver notification.

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 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

Email Privacy Notice

Document Control

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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: 27/02/2024

Change History Record

Issue	Description of Change	Date of Change
1.0	Initial Issue	