

Phoenix STS are committed to protecting your privacy and personal data. We'll only ask for and keep data that is adequate and relevant. By using this website, you are consenting to us using the data required within it to enable us to fulfil your request. Any information you provide us is stored on servers in the USA and Ireland, controlled and managed by Phoenix STS and securely protected against external digital threats and cyber-crime by our IT Support Specialists.

We will only use your data for the following reasons;

- To respond to your enquiries/queries
- To send you quotations or relevant product information following the above
- To process orders and training requirements
- For billing and accounting purposes
- To follow up on any of the above

To contact you occasionally by email, to tell you about products and services provided by us; however, you may choose to opt out of these at any time by return email. To help us operate our website and to help us diagnose problems with our server through the use of cookies - for further information, see our cookies policy.

We do not disclose any personal data to third parties. However, your data may be shared with trusted third parties for the following reasons:

- Some personal data will be shared with our manufacturing partners as part of your order fulfilment.
- Some personal data will be shared with delivery companies as part of your order shipping process.
- For accounting and VAT purposes.
- In cases where we are required by law to pass on information or if we believe action is necessary for fraud, cyber-crime or to protect the website, rights and personal safety of person/s.

Introduction;

This statement explains in detail the types of personal data we may collect about you when you interact with us, and it also explains how we'll store and handle that data, and keep it safe. It is likely that we may need to update this statement from time to time.

1. Legality

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data as set out below;

- **Contractual Obligations** – On certain occasions, we need your personal data to comply with our contractual obligations, e.g. if you order an item from us for home delivery, we'll collect your address details to enable us to deliver your goods and pass them onto the courier.
- **Legitimate Interest** – In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests, e.g. we will use your location or email address details to send you direct marketing information by post or email telling you about products and services we judge may be of interest to you.

- **Legal Requirements** – Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- **Third Party Purchasers** – any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your information uses it in a manner that is consistent with this policy.

2. When we collect your personal data

- When you visit our website and use your account to buy products and services on the phone, at our premises or on line
- When you make an online purchase
- When you create an account with us
- When you purchase a product or service at our premises or by phone but don't have an account
- When you contact us by any means with queries or complaints
- When you ask one of our staff to email you information about a product or service
- When you book any appointment with us or book us to provide training at your premises

3. The Type of Data we Collect

- If you have a web account with us we retain your name, billing/delivery address orders and receipt email and telephone number, e.g. details of purchases you make or any comments or complaints you make
- Details of your visits to our website
- Information gathered by the use of cookies in your web browser

4. How we use your personal data

It is our aim to give you the best possible customer experience and to achieve this; the data privacy laws allow us to do this as part of our legitimate interest to understand our customer's requirements.

- To process any orders that you make by using our website, by telephone, email or at our premises, e.g. your details may need to be passed to a third party to supply or deliver the product or service that you have ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, warranties etc.
- To respond to your queries, refund requests and complaints
- To protect our business and your account from fraud and other illegal activities
- To protect our customers, premises, assets from crime
- To process payments and to prevent fraudulent transactions, which helps to protect our customers from fraud
- Should we discover any criminal activity or alleged criminal activity by use of fraud monitoring and suspicious transaction monitoring, we will process the data for the purpose of preventing or detecting unlawful acts. We aim to protect the individuals we communicate with from criminal activities
- To comply with our contractual or legal obligations to share data with law enforcement agencies
- We may well need to share your details with a third party who is providing a service, e.g. delivery couriers or specific training by third parties arranged by us

5. How we protect your personal data

- Our computer consultants continually monitor our system for possible vulnerabilities and attacks.
- Access to your personal data is password protected, and sensitive data such as payment card information is secured by SSL encryption.

6. How long we keep your personal data

- Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected
- **Orders** – when an order is placed, we'll keep personal data for a minimum of five years so we can comply with our legal and contractual obligations. For certain products such as evacuation chairs, we'll keep the data for a minimum of 10 years
- **Warranties** – if we gave a warranty for the goods you ordered, any associated personal data will be kept until the end of the warranty period

7. Who do we share your personal data with

We sometimes share your personal data with trusted third parties. For example, delivery couriers, for fraud management, to handle complaints, our Accountants to help us with VAT and accounts queries. Here's the policy we apply to those organisations to keep your data safe and protect your privacy;

- We provide only the information they need to perform their specific services
- They may only use your data for the exact purposes we specify in our contract with them
- We work closely with them to ensure that your privacy is respected and protected at all times
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous

Examples of the kind of third parties we work with are;

- IT companies who support our website and other business systems
- Operational companies such as delivery couriers
- Training providers

Sharing your data with third parties for their purposes. We will only do this in very specific circumstances, for example;

- With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.
- For example, if you enter a holiday competition and tick a box agreeing that the travel company can send you promotional information directly. Or if we run a joint event with a restaurant, and you agree to receive direct communications from them.
- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may, from time to time, expand, reduce or sell the Business and/or Assets, and this may involve the transfer of divisions or the whole business to new owners. If this happens, your

personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

For further information, please contact our Data Protection Controller - Details can be found in Section 12.

8. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

International orders

If you are based outside of Ireland and place an order with us, we will transfer the personal data that we collect from you to the Partnership outside the EEA.

Protecting your data outside the EEA

- The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway
- We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA. For example, this might be required in order to fulfil your order, process your payment details or provide support services
- If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times.

If you wish for more information about these contracts, please contact our Data Protection Controller - Details can be found in Section 12. Any transfer of your personal data will follow applicable laws, and we will treat the information under the guiding principles of this Privacy Notice.

9. What are your rights over your personal data

An overview of your different rights, you have the right to request;

- Access to the personal data we hold about you, free of charge in most cases
- The correction of your personal data when incorrect, out of date or incomplete
- That we stop using your personal data for direct marketing (either through specific channels, or all channels)
- That we stop any consent-based processing of your personal data after you withdraw that consent
- Review by a Partner of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision)

You can contact us to request to exercise these rights at any time as follows;

To ask for your information, please contact The Data Protection Controller in writing. This can be done via post to Phoenix STS Ltd, Suite 20 Redleaf House Townspark Longford Co. Longford N39 YW68 or by email request to info@phoenixsts.ie. To ask for your information to be amended please contact our office by email as above or by phone on +353 (0) 43 33 49 611.

If we choose not to action your request, we will explain to you the reasons for our refusal.

Your right to withdraw consent

- Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent
- Where we rely on our legitimate interest
- In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your situation.
- We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data

Direct marketing

- You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels.
- We must always comply with your request.

Checking your identity

- To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.
- If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act

10. Contacting the regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Data Protection Commission Office.

You can contact them by calling +353 (0) 57 868 4800. Or go online to <https://www.dataprotection.ie> (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside Ireland, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 12.

11. If you live outside the Ireland

For all non-Ireland customers

- This Privacy Notice will be available in the English language. In case of any dispute about its meaning, the English version will take precedence.
- By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.
- Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and third parties located outside of Ireland.
- By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

- This may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers outside of Ireland.
- We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.
- We'll ensure that any third parties process your personal data only in accordance with their legitimate interests. These third parties may be subject to different laws from those which apply in your country of residence. Please note that we do not take active steps to ensure that any overseas recipient of your personal data complies with the laws which apply in your country.
- You may submit any questions, comments or complaints to our Ireland-based Data Protection Officer who will come back to you within 30 days.
- If you are contacting us to complain about an alleged breach of this Privacy Notice or our legal privacy obligations, please provide us with as much detail as possible in relation to your complaint.
- We will take every privacy complaint seriously and assess it with the aim of resolving all issues quickly and efficiently. We'd be grateful for your cooperation with us during this process by providing us with any relevant information that we may need.
- If we have not come back to you within 30 days, or you are not happy with the response that you've received, you may submit a complaint to your country's Office of Data Protection Commission.
- We are committed to keeping your personal information secure and will take all reasonable precautions to protect it from loss, misuse or unauthorised access or alteration. However, except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information.
- Nothing in this Privacy Notice restricts, excludes or modifies or purports to restrict, exclude or modify any statutory consumer rights under any applicable law including the Competition and Consumer Protection Act 2014.

12. Any questions

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Controller who will be pleased to help you:

Email us on info@phoenixsts.ie

Or write to us at

Data Protection Officer

Phoenix STS Ltd

Suite 20 Redleaf House

Townspark

Longford

Co. Longford.

Ireland.

N39 YW68

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