



SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 1 of 10
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The Power Group Incorporating Powerflow Electronics & Power Engineering

Contents

1. Introduction.....	2
2. Important information and who we are	2
3. The data we collect about you	3
4. How is your personal data collected?	4
5. How we use your personal data?	5
6. Data Security	6
7. Data Retention	6
8. Your Legal Rights	6
9. Glossary	7
10. Appendix 1.....	9

	Prepared By	Checked By	Supersedes	Changes
Name:	M. Lenane	F. Power	New Issue	
Date:	May 23, 2018	May 23, 2018		

SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 2 of 10
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1. Introduction

The Power Group respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

2. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how The Power Group collects and processes your personal data, including any data you may provide when you open an account with us, request information, sign up to our newsletter, purchase a product or service.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Controller

The Power Group is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name of legal entity: The Power Group (Powerflow Electronics & Power Engineering)

Postal address: Ring, Dungarvan, Co. Waterford. IRELAND. X35 R889

Telephone number: +353 58 46411

Email address: info@powerflow.ie

You have the right to make a complaint at any time to the Data Protection Commissioner (DPC), the Irish supervisory authority for data protection issues (www.dataprotection.ie). We would, however, appreciate the chance to deal with your concerns before you approach the DPC, so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 1 May 2018.


The data protection law in the EU will change on 25 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

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SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 3 of 10
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3. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).


We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes [first name, last name, username or similar identifier and title].
- **Contact Data** includes [billing address, delivery address, email address and telephone numbers].
- **Financial Data** includes [bank account and payment card details].
- **Transaction Data** includes [details about payments to and from you and other details of products and services you have purchased from us].
- **Technical Data** includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website].
- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses].
- **Usage Data** includes [information about how you use our website, products and services].
- **Marketing and Communications Data** includes your preferences in receiving marketing from us or not.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

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SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 4 of 10
		This Document and the information contained within is the property of The Power Group. This document may not be reproduced in any form whatsoever, without prior written permission from The Power Group.	

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website or online store or by email/telephone/fax;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - give us some feedback;
 - request a quotation
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties [and public sources] as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers [such as Google based outside the EU]
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- **Automated technologies or interactions**


As part of the e-store facility Power Group will retain certain information including your name, address, phone numbers, e-mail address, IP address, billing address and shipping address and product selection.

This information will be retained in accordance with our obligations under the Data Protection Act 1988.

The Power Group may use your personal data for the following purposes:

- To fulfil your order;
- If there are any queries on your order or if there is a problem with fulfilling your order;
- To advise you of any promotional offers that may be of interest to you;
- To facilitate ease of use of the Site by you so that you do not have to input all your details again should you re-visit the Site. For this purpose our website may use “cookie” technology. You may de-activate cookies on your Internet browser although this may inhibit your ability to use all features on the site;
- Your information will be held by The Power Group (or its successors, assigns or purchasers) and we do not disclose or sell the personal information of any of our customers, other than for the purpose of fulfilling you order.

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SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 5 of 10
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5. How we use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate (Appendix 1).

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing


We will get your express opt-in consent before we share your personal data with any company outside The Power Group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us and requesting that your details be removed from our mailing list.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

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SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 6 of 10
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Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data Retention


How long will you use my personal data for?

Information collected by us will be held for as long as it is required to fulfil the purpose for which it is collected and to protect our business and our rights. We are required to keep certain types of information for a specific period of time in order to comply with legal requirements.

8. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please contact us.

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SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 7 of 10
		This Document and the information contained within is the property of The Power Group. This document may not be reproduced in any form whatsoever, without prior written permission from The Power Group.	

9. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the EU who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers,
- Parties associated with the shipping, delivery and logistics of orders
- accountants, auditors and insurers based in the EU who provide consultancy,
- banking, legal, insurance and accounting services.
- Irish Revenue, regulators and other authorities acting as processors or joint controllers based in the EU who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS


You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however,

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SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 8 of 10
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that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.


Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.


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SOP Number: MS056	Revision: A	TITLE: Privacy Policy - GDPR	Page: 9 of 10
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10. Appendix 1

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Financial 	<ul style="list-style-type: none"> ➤ Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> ➤ Manage payments fees, and charges ➤ Collect and recover money owed to us ➤ Shipping, delivery and Logistics 	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Financial ➤ Transaction ➤ Marketing & Communications 	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Necessary for our legitimate interests (to recover debts due to us) ➤ Necessary for our legitimate interests (to ship/deliver and move all orders)
To manage our relationship with you which will include: <ul style="list-style-type: none"> ➤ Notifying you about changes to our terms or privacy policy ➤ Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Profile ➤ Marketing & Communications 	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Necessary to comply with a legal obligation ➤ Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Profile ➤ Usage ➤ Marketing & Communications 	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Technical 	<ul style="list-style-type: none"> ➤ Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) ➤ Necessary to comply with a legal obligation

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To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve you	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Profile ➤ Usage ➤ Marketing & Communications 	<ul style="list-style-type: none"> ➤ Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> ➤ Technical ➤ Usage 	<ul style="list-style-type: none"> ➤ Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> ➤ Identity ➤ Contact ➤ Technical ➤ Usage ➤ Profile 	<ul style="list-style-type: none"> ➤ Necessary for our legitimate interests (to develop our products/services and grow our business)

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