

## PRIVACY NOTICE FOR CLIENTS AND PROSPECTS

### WELCOME

Dear (future) customer, we process your personal data when we sell our products and deliver our services.

With this notice we would like to explain how and for which purposes we process and use your personal data in connection with **Stairlift and Home Elevators Sales and Max Home Services** and which rights and options you have in this respect. We take into account the applicable data protection laws, such as the General Data Protection Regulation 2016/679 and national data protection laws.

### WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

The **controller** for the data processing is:

TK Access Solutions Limited

Eagle Court, De Havilland Ave, Preston Farm Industrial Estate, Stockton-on-Tees TS18 3TB

E-mail: [tka\\_uk\\_qdpr@tkelevator.com](mailto:tka_uk_qdpr@tkelevator.com)

Our **Data Protection Coordinator** can be reached at:

TK Access Solutions Limited

Eagle Court, De Havilland Ave, Preston Farm Industrial Estate, Stockton-on-Tees TS18 3TB

E-mail: [tka\\_uk\\_qdpr@tkelevator.com](mailto:tka_uk_qdpr@tkelevator.com)

### To WHOM DOES THIS PRIVACY NOTICE APPLY?

This privacy notice applies to the following groups of persons:

- **Interested parties:** You are an interested party if you contact us because you are interested in a specific product or have general questions.
- **Customers:** You are a customer if you are in the process of concluding or have concluded a contract with us.
- **Users:** You are a user if you are the person who uses or will use our products. We collect and process your data to provide our services and for the specification of our products.

It may happen that a customer concludes a contract for a third party, which will be using our products. In this case, the customer and the user are different people.

### FOR WHICH PURPOSES WILL WE USE YOUR PERSONAL DATA?

We may process your personal data for the following purposes ("Permitted Purposes"):

- To manage the administrative, accounting and commercial aspects of proposals and sales contracts concerning a product or a service (e.g. invoicing, preparing proposals, payment follow-up);
- To communicate with you after you have contacted us;

- To provide our services to you and manage the products you are using like the installation and maintenance of a Stairlift or a Home Elevator or the performance of the Max Home Service;
- To improve our existing products and services, or to develop new products or services;
- To do marketing and advertising communication, e.g. by sending you e-mails with new products/services we have developed, to send newsletters or to inform you about promotions, or to contact you when an existing customer informs us of your interest in our products;
- To verify if the customer has a positive credit score;
- To prevent and investigate criminal offences and fraudulent acts;
- To strengthen and secure our IT-systems;
- To comply with legal obligations (e.g. call-backs, sanction screening), or in the context of legal proceedings;
- To conduct customer satisfaction surveys.

We will not use your personal data for any automated decisions affecting you, or for profiling.

### ON WHICH LEGAL BASES DO WE PROCESS YOUR PERSONAL DATA?

We will process your personal data for the above purposes based on the following legal bases:

- You have given consent for the processing of your personal data.
- The processing is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into such a contract.
- The processing is necessary for our or a third party's legitimate interests. Our legitimate interests include our commercial interests in operating our business in a professional, sustainable manner (and bearing in mind our global presence).
- The processing is necessary for compliance with a legal obligation to which we are subject, for example compliance with tax regulations, verifying if the client is subject to economic sanctions.

### SCOPE OF PERSONAL DATA

Unless otherwise agreed with you, we will collect only personal data which are required in connection with the above-mentioned purposes. This includes any information you provide to us directly through data collection forms and information which is derived from such collected data or otherwise collected or generated in the course of our contractual or commercial relation with you.

This may include the following categories of data:

- Identification data such as name, username, client ID, date of birth, specifications of our products;
- Physical data relevant for the specification of our products such as weight, height;
- Contact data such as address, email address, phone number, country of residence;
- Voice recording;
- Financial data such as your bank account number;
- Service data (Max Home Service) such as data on the status and use of the product (door movements, information on trips, real-time status of the product, energy consumption, uptime etc.);
- Contract data such as order number, serial number, customer number;

- IT-related data such as details on the use of an application, IP address of the device or a mobile device number;
- Marketing-related data like interest in one of our products;
- Special categories of Personal Data. Where required for the above Permitted Purposes and only where required or permitted by applicable law where you have specifically given us your consent, we may process data concerning health such as degree/level of care, physical and health restrictions and special requirements related to the health data.

## FROM WHICH SOURCES DO WE COLLECT PERSONAL DATA?

We will collect your personal data primarily directly from you when you interact with us in the course of your contract, e.g. when you complete customer questionnaires, visit our website or other communication or working platforms and when you communicate with us in relation to your contract. We also collect data from the product in use. We also work with companies who you have interacted with and who provide us with contact details for potential customers. We make sure that these companies have an appropriate legal basis to provide us with this personal data, such as your consent.

## HOW DO WE PROTECT YOUR PERSONAL DATA

We maintain organisational and technical measures in accordance with the technical state of the art and applicable data protection legislation to protect your personal data from unauthorised access or intrusion. These safeguards include implementing specific technologies and procedures designed to protect your privacy, such as secure servers, firewalls and SSL encryption. We will at all times strictly comply with applicable data protection legislation.

## WITH WHOM WILL WE SHARE YOUR PERSONAL DATA?

We may share your personal data with:

- Our affiliates within TKElevator Group worldwide if and to the extent required for the Permitted Purposes. In such cases, these entities will then use the Personal Data for the same purposes and under the same conditions as outlined in this Privacy Notice.
- Third parties who process your personal data on their own behalf but in connection with a service provided to us or you on our behalf for the Permitted Purposes (for example public authorities to fulfil a legal obligation, banks and credit institutions).
- Service providers (so called data processors) within or outside of TKElevator Group, domestically or abroad (for example service providers, including cloud providers, call centers) instructed by us to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. TKElevator will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging with such service providers.

## WHERE WILL YOUR PERSONAL DATA BE PROCESSED?

TKElevator is a globally active enterprise. In the course of our business activities, we may transfer your personal data also to recipients in countries outside of the European Economic Area (“third countries”), in which applicable laws do not offer the same level of data protection as the laws of your home country. When doing so we will comply with applicable data protection requirements and take appropriate safeguards to ensure the security and integrity of your personal data, which may consist in entering into the EU Standard Contractual Clauses which are available at [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en). We will assess the risks for your rights before transferring your personal data to a third country and take appropriate measures to ensure that your personal data will enjoy a similar level of protection as provided by the applicable data protection laws.

## YOUR RIGHTS AS A DATA SUBJECT

Subject to certain conditions, you have the following rights in relation to the personal data we process:

- Right to be informed: You have the right to be informed, at the latest at the time of collection of your data, about the processing we carry out, your rights relating to it and the exercise of these rights. To this end, we have drawn up this Privacy Notice.
- Right of access: You are entitled to see the information TKElevator holds about you and to obtain a copy of this personal data.
- Right of correction or completion : If your personal data have changed or are incorrect, you are entitled to ask TKElevator to rectify, complete or erase the incorrect or incomplete data TKElevator holds about you.
- Right of erasure: In certain circumstances, you have the right to request that your personal data is erased e.g. if the personal data is no longer necessary for the purposes for which it was processed or when you have withdrawn your consent and there is no other legal basis for the processing.
- Right to object to or restrict processing: in certain circumstances, you have the right to obtain the restriction of the processing of your personal data and to object to the processing of your personal data. This right cannot be exercised when the processing is required for the execution of legal obligations. In particular you have the right to object to our processing of your personal data based on our legitimate interests. In this case, we will no longer process your data for these purposes unless our legitimate interests override your rights and freedoms or the processing is necessary for the establishment, exercise or defense of legal claims.
- Right of data portability : You also have the right to receive the personal data which you have provided to TKElevator and transmit these data to another data controller.

For any of the above requests, please contact us, stating the right you wish to exercise, as well as your name, address and customer ID as proof of identity to the contact details below. We may require additional proof of identity to protect your personal data against unauthorized access. We will carefully consider your request and may discuss with you how it can best be fulfilled.

If you have given us your consent for the processing of your personal data, you can withdraw the consent at any time with future effect, i.e. the withdrawal of the consent does not affect the lawfulness of processing based on the consent before its withdrawal. In case consent is withdrawn, we may only further process the personal data where there is another legal basis for the processing and we will provide the relevant information about the continued processing activity.

If you have any concerns about how your personal data is handled by us or wish to raise a complaint, you can contact us at the contact details below to have the matter investigated. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can file a complaint with the competent data protection supervisory authority in your country. You may approach either the supervisory authority which is locally competent for you or the supervisory authority which is locally competent for us.

You can find the contact details of the competent Data Protection Authority in your country on this website [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

## ARE YOU REQUIRED TO PROVIDE PERSONAL DATA?

As a general principle, you will provide us with your personal data entirely voluntary. Please keep in mind that in some instances, it is possible that we cannot perform our services without your personal data.

## HOW LONG DO WE STORE YOUR PERSONAL DATA?

Your personal data will be deleted when it is no longer reasonably required for the Permitted Purposes or when you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data.

Since the need to retain personal data depends on the type of personal data and the purpose of the processing, the retention periods will vary. The retention periods are based on the following criteria:

- How long do we need the data to be able to provide the requested service?
- Have we defined and announced a specific retention period?
- Have we been granted permission to extend the retention period?
- Are we subject to a legal or contractual obligation, or a comparable obligation?

Personal data that is no longer needed for the purpose, or does not fall within the scope of a legal obligation, will be permanently deleted or anonymised.

We will in particular retain your personal data where required and appropriate for TKElevator to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

### UPDATES TO THIS DATA PROTECTION NOTICE

This Data Privacy Policy was last updated in August 2022. We reserve the right to update and change the policy from time to time in order to reflect and changes to the way in which we use your personal data or changing legal requirements. Any amended Data Privacy Policy will apply from the date it is posted on our webpage or otherwise made available to you.

### HOW TO GET IN TOUCH WITH US

For any questions and comments or in case you want to assert your rights, please contact our DPO via email on: [tka\\_uk\\_gdpr@tkelevator.com](mailto:tka_uk_gdpr@tkelevator.com)

Alternatively please write to us at:

Eagle Court, De Havilland Ave, Preston Farm Industrial Estate, Stockton-on-Tees TS18 3TB