

Rolls

Barden UK Ltd
(Trading as Rolls Distribution)
Third Party Data Privacy Notice

Privacy Notice

Who we are

Barden UK Ltd, trading as [Rolls Distribution], of 5 Little Park Farm Road, Segensworth West, Fareham, Hampshire, PO15 5SJ, is the data controller responsible for your personal data.

About this privacy policy

This notice sets out in clear and plain language our commitment to protecting and respecting your privacy and your data rights as required by the General Data Protection Regulation 2016 (the “GDPR”). If there is anything you do not understand after reading it please contact us using the details you will find below.

What is personal information?

Personal information means any information about you that is personally identifiable, including your name, age, address, telephone number, email address, financial details, and any other information from which you can be identified. It also includes genetic and biometric data, location data and online identifiers that may identify you, such as your internet protocol (IP) address (the unique personal address that identifies your device on the internet) and mobile device IDs.

In this Privacy Notice we explain:

- The types of personal data we collect;
- Purposes for which we use the data;
- Who we share your personal data with;
- How we protect your data; and
- Your rights in respect of your personal data and other matters

It applies whenever we collect your personal data, so please read it carefully. This privacy policy will form part of our digital terms of use as we introduce more websites or platforms that collect data.

We update this policy periodically, so feel free to return to this notice and read it again from time to time.

The types of personal data we use and its sources.

In order to operate our business and provide our products to our customers, we gather a range of personal data i.e.

- Some of this data we will gather directly from you via our staff, and in future online, during the customer/supplier onboarding process and then afterwards during the term of our relationship with you;
- Some of this data we may obtain indirectly by reason of your interactions with us, including our websites
- Some of this data we may obtain from third party sources, where you give us your permission, and where it is necessary to enable us to perform our contract with you or to enable us to comply with a legal obligation.

These categories of personal data **may** include:

- Personal data about you, such as name, address, telephone numbers, bank details;
- Financial or employment data, either that you provide or we obtain from credit rating agencies;
- Transactional data that we obtain from and process about you during the time you have a contract and relationship with us;
- Technical data, such as IP addresses, we capture from the devices and technology you use to interact with us; and
- Marketing preferences you have provided.

Purposes for which we use your data

We are required to inform you of the purposes for which we use your personal data, the legal reasons for doing so and, if we rely on a so-called “legitimate interest” as a reason, to tell you what that legitimate interest is. A legitimate interest reason for using your data is one which is justified for a good business reason, or a commercial purpose such as marketing.

Why we use your personal information	Our reasons	Our legitimate interests
Managing your relationship with us. Developing new products and services to meet our customers’ needs. Advertising our products and services. Marketing and various forms of contact with you. Analysing how our customers use our products and services.	Fulfilling contracts; our legitimate interests; consent.	Product development. Informing you about those of our products and services which we think may interest you. Asking your consent, if we need it, to contact you.
Meeting our warranty commitments	Fulfilling contracts; our legitimate interests.	Fulfilling effectively our legal and contractual duties.
Managing our relationships with third parties that provide services to us, to enable us to provide services effectively to you.	Fulfilling contracts; our legitimate interests; our legal duty.	Fulfilling effectively our legal and contractual duties
Delivery of our products and services to you. Management of customer payments. Collection of money that is owed to us.	Fulfilling contracts; our legitimate interests; our legal duty.	Fulfilling effectively our legal and contractual duties
Detection, investigation, reporting, and prevention of financial crime. To obey laws and regulations that apply to us. To manage risk for us and our customers. Complaints handling.	Fulfilling contracts; our legitimate interests; our legal duty.	Developing methods to prevent financial crime. Fulfilling effectively our legal and contractual duties

Effectively operating our business, through the management of our financial position, business capability, planning, communications, corporate governance, and by conducting compliance and audit activities.	Our legitimate interests; our legal duty.	Fulfilling effectively our legal and contractual duties
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Who we share your personal data with

We collect personal information when you open an account with us or place an order for products or services or commence trading with us. We will use this information to provide the services requested, manage our business relationship with you, maintain warranty records (where applicable) and, if you agree, to send you marketing information.

We may share your personal data with any affiliated company within the Eco-Bat Technologies Limited group of companies (Eco-Bat), including for marketing purposes. By means of intragroup agreements, we gain assurance about the security over and the processing of your personal data.

We may use third parties to provide or perform services and functions on our behalf, in doing so we may make personal information available to these third parties, to perform these services and functions. Any processing of that personal information will be on our instructions and compatible with the original purposes.

We may also make personal information concerning individuals available to public or judicial authorities, law enforcement personnel and agencies as required by law, including to meet national security or law enforcement requirements, and including to agencies and courts in the countries where we operate. Where permitted by law, we may also disclose such information to third parties (including legal counsel) when necessary for the establishment, exercise or defence of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of others, or as needed to support external audit, compliance and corporate governance functions.

Personal information may be transferred to a party acquiring all or part of the equity or assets of Eco-Bat or its subsidiaries in the event of a sale, merger, liquidation, dissolution, or other.

How we protect your data

The data we collect is stored on information technology systems owned and/or operated by [Barden UK Ltd], or that of verified third parties. All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet or email is not completely secure and although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet to our site or by email; any transmission is at your own risk. Once we have received your information, we will use all necessary procedures and security measures to try to prevent unauthorised access, loss, disclosure or amendment.

Your rights in respect of your personal data and other matters

Data Protection Principles

Under the provisions of the original DPA Act and new GDPR regulations, the personal data that is held about you by the company must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that have been clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes the company have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as necessary for the purposes you have been told about.
6. Kept securely.

Your Rights

You have a number of rights in respect of how we use your personal information:

- You have the right to withdraw consent at any time and require us to cease any data processing which we are undertaking that relies solely on consent.
- You have the right to ask us to rectify any inaccuracies in your personal information.
- You have the right to ask us to erase or restrict processing of your personal information if it is no longer necessary for us to process in accordance with any contract, legal/regulatory obligation or legitimate interest.
- You have the right to ask us to cease or not to process your personal data for marketing purposes.

You can exercise the above rights by contacting us, as outlined below.

How long we retain your data for

We will hold your personal data for either as long as you are our customer/supplier or you continue to owe us any money. If you stop being a customer/supplier of ours we will keep your personal data for no longer than 6 years from that date, because we are obliged by law to retain a record of transactional data and to enable us respond to any complaints during this period.

Such a maximum retention period may be overridden by a valid legal or regulatory requirement for us to retain your personal data for a longer period, including enabling us to answer any ongoing legal or regulatory inquiries.

Your objection to us processing your personal data

We need to collect personal data from you for performance of a contract and for compliance with our legal and regulatory obligations. You may refuse to provide us with your personal data at any time in our relationship because you object to such processing, but if you do so we may not be able to continue to provide goods or services to you, or we may have to terminate our relationship with you. If you do withdraw your consent where we previously have asked for it, this will not invalidate our use of your personal data prior to that withdrawal.

Sending Personal Data outside the European Economic Area (EEA)

We may send your personal data outside the EEA in order to enable us to perform our contract with you, comply with a legal obligation, or where we have a legitimate interest in so doing.

Before we send any personal data to an organisation outside the EEA we will make sure it is protected to the same or similar standards as if it was being used within the EU, by means of a contract between us and the overseas organisation, or by relying upon the EU Commission's finding of that country having adequate data protection provisions in place.

Currently, we have one key data transfer relationship that involves some personal data being transferred and processed outside the EEA. This results from certain of the senior management of Eco-Bat, plus some of its oversight, management, compliance and audit functions, being physically located in the USA. Whilst that company is registered and domiciled in the United Kingdom:

- Such persons may access certain of your personal data while they are located outside the EEA.
- Such persons may process, maintain and/or store certain of your personal data using electronic servers that are located in the USA

Links on our websites

Our website may, from time to time, contain links to and from the websites of our affiliated companies. If you follow a link to any of these websites, please note that these websites may have country specific provisions impacting their privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Complaints

If you are dissatisfied about how we have used your personal data, you can contact us using the details below.

Alternatively, you also have the right to complain direct the relevant National Data Protection Authority (e.g. the ICO in the UK, BDSG in Germany, CNIL in France, and the GPDP in Italy), although they will ask you whether you have raised the matter with us beforehand.

How to contact us

In the event of any issues please EMAIL us at: dataprivacy@ecobat.tech