

---

## PRIVACY POLICY

---

**BACKGROUND:**

Kelling Group Limited, along with subsidiary businesses (Access Hire Nationwide Limited, Welfare Hire Nationwide Limited & Modular Hire Nationwide Limited) (“Kelling Group”) is committed to conducting its business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct.

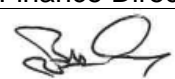
Kelling Group understands that your privacy is important to you and that you care about how your personal data is used and shared. We respect and value the privacy of everyone who use our products and/or services and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

**1. Definitions and Interpretation**

In this Policy, the following terms shall have the following meanings:

<b>“personal data”</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
<b>“We/Us/Our”</b>	means Kelling Group Limited, a limited company registered in England under company number 09065751, or any of the business units within the group (Access Hire Nationwide Limited, company number 06327334, Welfare Hire Nationwide Limited, Company Number 01992228 & Modular Hire Nationwide Limited, company number 10755307) whose registered address is Unit F, Trident Park, Rosie Road, Normanton. WF6 1ZB.
<b>“Our Sites”</b>	One of the websites operated by us as follows:  <b>Access Hire Nationwide:</b> <a href="http://www.accesshirenationwide.com">www.accesshirenationwide.com</a> <b>Welfare Hire Nationwide:</b> <a href="http://www.welfarehire.co.uk">www.welfarehire.co.uk</a> <b>Modular Hire Nationwide:</b> <a href="http://www.modularhire.co.uk">www.modularhire.co.uk</a> <b>Kelling Group:</b> <a href="http://www.kellinggroup.co.uk">www.kellinggroup.co.uk</a>

<b>Version:</b>	1.0	<b>Approved By:</b>	John Battersby, Finance Director
<b>Author:</b>	S.Bryars	<b>Signature:</b>	
<b>Date Written:</b>	25.04.2018	<b>Approval Date:</b>	22.05.2018

## 2. Information About Us

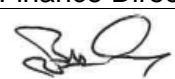
- 2.1 We are known as Kelling Group Limited, a limited company registered in England under company number 09065751 whose registered address is Unit F, Trident Park, Rosie Road, Normanton. WF6 1ZB
- 2.2 Our VAT number is 193435688.
- 2.3 Our Board of Directors are responsible for ensuring the business complies with the GDPR and any related regulation. They can be contacted on [GDPR-Compliance@kellinggroup.co.uk](mailto:GDPR-Compliance@kellinggroup.co.uk) or in writing to:  
GDPR Compliance, Kelling Group, Unit F, Trident Park, Rosie Road, Normanton, WF6 1ZB
- 2.4 We are registered with the Information Commissioners office to ensure we are fully compliant at all times.

## 3. What Does This Policy Cover?

This Privacy Policy covers the data we collect from you, or about you from 3<sup>rd</sup> parties, how we will store, process and handle that data, and how we will destroy, or other wise modify that data once it is deemed no-longer useful or required.

## 4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
- 4.1.1 The right to be informed about Our collection and use of personal data;
- 4.1.2 The right of access to the personal data We hold about you (see section 12);
- 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
- 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 4.1.7 The right to object to Us using your personal data for particular purposes; and
- 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information

<b>Version:</b>	1.0	<b>Approved By:</b>	John Battersby, Finance Director
<b>Author:</b>	S.Bryars	<b>Signature:</b>	
<b>Date Written:</b>	25.04.2018	<b>Approval Date:</b>	22.05.2018

Commissioner's Office.

- 4.3 For further information about your rights, please contact the Information Commissioner's Office.

## 5. What Data Do We Collect?


Depending upon your use of our services, we may collect some or all of the following personal and non-personal data:

- 5.1 Name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 business/company name
- 5.5 job title;
- 5.6 profession;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as post code, preferences, and interests;
- 5.9 financial information such as credit / debit card numbers;
- 5.10 IP address;
- 5.11 web browser type and version;
- 5.12 operating system;
- 5.13 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;
- 5.14 Location

## 6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary considering the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the General Data Protection Regulations at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, we may use your data for the following purposes:
- 6.2.1 Providing and managing your access to Our Sites;
  - 6.2.2 Personalising and tailoring your experience on Our Sites;
  - 6.2.3 Supplying Our products or services to you (please note that We require your personal data in order to enter into a contract with you);

Page | 3


<b>Version:</b>	1.0	<b>Approved By:</b>	John Battersby, Finance Director
<b>Author:</b>	S.Bryars	<b>Signature:</b>	
<b>Date Written:</b>	25.04.2018	<b>Approval Date:</b>	22.05.2018

- 6.2.4 Personalising and tailoring Our product and service offering to you;
  - 6.2.5 Replying to emails from you
  - 6.2.6 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by contacting GDPR-Compliance@kellinggroup.co.uk);
  - 6.2.7 Market research;
  - 6.2.8 Analysing your use of Our Sites and gathering feedback, to enable Us to continually improve Our Sites and your user experience;
- 6.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email, telephone, SMS or post to provide you with information, news and offers on our products and/or services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties (including our analytics software provider) whose content appears on Our Sites may use third party cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 6.6.1 Details of visitors to our website will be kept for a period not longer than 5 years from the date you visit.
  - 6.6.2 Any data sent to us using our 'Contact Us' forms will be kept only to contact you, and will be destroyed upon making contact with you, unless it is established that you require one or more of our services
  - 6.6.3 Should you require any of our services, your personal information will only be shared with our sales team who may use the information you supply to offer you goods and/or services at a competitive rate.

## 7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).

Page | 4

<b>Version:</b>	1.0	<b>Approved By:</b>	John Battersby, Finance Director
<b>Author:</b>	S.Bryars	<b>Signature:</b>	
<b>Date Written:</b>	25.04.2018	<b>Approval Date:</b>	22.05.2018


- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure all personal data we hold.
- 7.4 Steps We take to secure and protect your data include:
- 7.4.1 Data encryption where possible
  - 7.4.2 Data Anonymisation where appropriate
  - 7.4.3 Secure named access to locations where data is stored.

## 8. Do We Share Your Data?

- 8.1 We may share your data with other companies in our group to ensure we can provide you with a vast array of products and/or services. This includes Our subsidiaries AND/OR our holding company and its subsidiaries.
- 8.2 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 8.4 We may sometimes use third party data processors that are located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 8.5 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## 9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

<b>Version:</b>	1.0	<b>Approved By:</b>	John Battersby, Finance Director
<b>Author:</b>	S.Bryars	<b>Signature:</b>	
<b>Date Written:</b>	25.04.2018	<b>Approval Date:</b>	22.05.2018

- 9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

## 10. How Can You Control Your Data?

- 10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Sites, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. Your Right to Withhold Information


- 11.1 You may contact us to enquire about, discuss or request our services without giving us any information about yourself.
- 11.2 You may access any of Our Sites without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 11.3 You may restrict Our use of Cookies. For more information, see section 13 and Our Cookie Policy.

## 12. How Can You Access Your Data?


You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [GDPR-Compliance@kellinggroup.co.uk](mailto:GDPR-Compliance@kellinggroup.co.uk), or using the contact details below in section 14. Alternatively, please refer to Our Data Protection Policy.

## 13. Our Use of Cookies

- 13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and/or services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

<b>Version:</b>	1.0	<b>Approved By:</b>	John Battersby, Finance Director
<b>Author:</b>	S.Bryars	<b>Signature:</b>	
<b>Date Written:</b>	25.04.2018	<b>Approval Date:</b>	22.05.2018

- 13.2 By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for monitoring visits and to ensure our information is up-to-date and relevant. For more details, please refer to section 6, above, and to section 13.6 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Sites will not be impaired by refusing consent to them.
- 13.3 All Cookies used by and on Our Sites are used in accordance with current Cookie Law.
- 13.4 Before Cookies are placed on your computer or device, you will be shown a pop-up or banner requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Sites may not function fully or as intended.
- 13.5 Certain features of Our Sites may depend on Cookies to function. "Cookie Law" deems these Cookies to be "strictly necessary". These Cookies are shown below in section 13.6. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below in section 13.10, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 13.6 No first or third party cookies are used by our websites at the time of this publication. We reserve the right to introduce cookies in the future should our website require that we do so. The processing of these cookies will be in accordance with this policy.
- 13.7 Our Site uses analytics services. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables Us to improve Our Sites and the products and/or services offered through it.
- 13.8 Our website analytic software doesn't use cookies, rather an inbuilt code within Our sites. This minimises the amount of data collected and ensures that we only collect the data that is deemed necessary for the purpose of which we may process that.
- 13.9 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 13.10 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

<b>Version:</b>	1.0	<b>Approved By:</b>	John Battersby, Finance Director
<b>Author:</b>	S.Bryars	<b>Signature:</b>	
<b>Date Written:</b>	25.04.2018	<b>Approval Date:</b>	22.05.2018

- 13.11 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### 14. Policy Maintenance

All inquiries about this policy, including requests for exceptions or changes should be directed to the Kelling Group GDPR Team at [GDPR-Compliance@kellinggroup.co.uk](mailto:GDPR-Compliance@kellinggroup.co.uk) or in writing to GDPR Compliance, Kelling Group, Unit F, Trident Park, Rosie Road, Normanton, WF6 1ZB.

##### 14.1 Availability

This policy shall be available to all Kelling Group Employees via the company IT system, being stored in a shared network location.


This policy shall be made available on all Kelling Group websites, and in word document or PDF format upon request.

##### 14.2 Effective Date

This policy is effective as of the approval date below.

##### 14.3 Revisions

The IT Department and Board of Directors are responsible for the maintenance and accuracy of this policy. Notice of significant revisions shall be provided to Kelling Group Employees through their Line Manager or via Email from a member of The Board of Directors, Senior Management or the IT Department. Changes to this policy will come into force when the updated policy is circulated.

<b>Version:</b>	1.0	<b>Approved By:</b>	John Battersby, Finance Director
<b>Author:</b>	S.Bryars	<b>Signature:</b>	
<b>Date Written:</b>	25.04.2018	<b>Approval Date:</b>	22.05.2018