



## Privacy Notice – Notify MBSE App

### 1. Introduction

This Notice applies to our use of personal data as a result of our provision of the Notify MBSE (the “App”) to our customers, clients, or users (“you” and “your”). This Notice describes how MBS Equipment UK Limited (the “Company”, “MBSE”, “we” or “us”) will collect, store, use and otherwise process such personal data about users of its App, including applicable data protection rights and the measures we take to protect your personal data. We are committed to the protection of the personal data that we process about you in line with our data protection obligations.

We may amend this Notice from time to time and will inform you in advance of the effective date of any material changes that we intend to implement via our app.

Our Terms of Service set out how you are permitted to use the App. Please ensure that you have read them before using the App.

Terms defined in the GDPR or in the definitions section below shall have the meaning set out in this Notice.

### 2. Identity of the Data Controller

MBS Equipment UK Limited is responsible for processing your personal data and is the data controller. Our registered office is located at Lakeside Road, Colnbrook, Slough, England, SL3 0EL. We may be contacted at the following email address: [NotifyMBSE@mbseco.uk](mailto:NotifyMBSE@mbseco.uk)

### 3. How We Source Your Personal Data

You will have directly provided most of the personal data that we process about you. The Company collects your information at the create an account stage of the App, via your Mobile Telephone Handset.

### 4. Categories of Personal Data that We Process, Our Purposes for Processing and the Applicable Lawful Bases

The categories of personal data that we may process about you and our purposes for doing so are set out in the table below. The table also identifies our lawful basis for the processing. We will only process your personal data where we have a lawful basis to do so under data protection laws.

We generally collect and process personal data in order to approve and create your account and to perform the services.

Accounts will have to be approved once created to ensure they belong to existing customers. If your application to use the App is approved successfully, personal data will be gathered during the create an account process. Your subsequent and completed App Notifications will be administered and retained during the Company’s lifetime use of the App.

Generally, we rely on our legitimate interests to process your personal data. Further details of the processing are included in the table below.

Categories of Personal Data	Purpose of Processing	Lawful Basis
Your: <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Mobile telephone number</li> <li>• Job title</li> <li>• Unique mobile telephone handset ID code</li> <li>• The date/time when your account was created</li> </ul>	To approve your application for an account and if approved, to create an account.  To enable you to log-in and use the App  To communicate with you  To enable us to monitor the App and provide customer support	Legitimate interests (to perform the services)
Total number, the content of and lifetime storage of the App Notifications that you have generated including any attachments such as and not limited to, Photographs, Videos, Spreadsheets, Emails	To provide the services via the App  To enable us to manage your account  To manage App notifications from their Customers/Clients/Users to process, review and to take any required appropriate corrective actions	Legitimate interests (to perform the services)
Technical data, including: 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 this website.	To administer and protect our business and the App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	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)

You are not required to provide any requested information to us but failing to do so will result in not being able to continue your request to create an account and therefore use of the App.

The Company will not use your data for any purpose other than for its provision of the App, its related services, its Database and anything else directly or indirectly associated with your App Notification that you have submitted and to comply with its legal obligations.

#### 5. Who has access to data?

Your information will be shared internally within the MBSE Group of companies for the purposes of the App process. This may include, as appropriate, members of our Sales, Operational, Technical,

Finance, Human Resources, Administration, Information Technology departments and the Company's Directors if access to the data is necessary for the performance of their roles.

The Company may need to share your data with third parties. For example, if your App Notification requires the Company to seek technical advice to enable a conclusion to your App Notification.

The Company may need to transfer your data outside the United Kingdom, European Union or European Economic Area in certain circumstances and with trusted third-party vendors and business partners. We may share personal data with such third parties (such as the app developer, other MBSE companies) so that they may perform services and carry out functions on our behalf. We may also refer the details of your App Notification to the manufacturer of the particular product which is the subject of your App Notification. Such transfer will only relate to the Product Related Data.

If we transfer your personal data out of the UK/EU/EEA we will ensure a similar degree of protection is afforded to it as within the UK/EU/EEA by ensuring at least one of the following safeguards is implemented:

- The transfer of your personal data is to a country that has been deemed by the European Commission or a supervisory authority to provide an adequate level of protection for personal data;
- Where we have entered into a specific contract with the recipient of the personal data, which has been approved by the European Commission or a supervisory authority as a method of protection for personal data when it is transferred outside of the UK/EU/EEA, for example the Standard Contractual Clauses; or
- A specific certification mechanism that may be approved by a relevant supervisory authority for the purposes of effecting an international transfer of personal data.

Please contact us if you want further information.

## 6. How does the Company protect data?

The Company takes the security of your personal data seriously. While no transmission over the internet can be guaranteed to be secure from intrusion, the Company has implemented internal policies and controls which are designed to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by our employees and approved third-parties in the proper performance of their duties.

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. For how long does the Company keep data?

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

Your personal data will be retained for so long as necessary to achieve the purposes described in this notice. At the end of that period, we will either delete your personal data, or anonymise your personal data for the purposes of data analysis. We may retain your personal data for a longer period if we need to retain it in order to comply with our legal obligations or if we need to retain it in order to pursue or defend our legal rights.

If you use the App, the Company may hold your Account Data on file for the period in which you make use of the App and for 60 months after this period for record keeping purposes. Product Related Data (including the identity of the person raising a particular issue with a product) will be retained indefinitely for the purpose of product and on-going historical data analysis. We will periodically review Product Related Data to determine whether it is still relevant to our business, and we will delete any personal data that is no longer relevant to our business.

## 8. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **PROMOTIONAL OFFERS FROM US**

We may use your personal 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).

### **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **OPTING OUT**

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

## 9. Your Rights

As a data subject, you have several rights under data protection laws. You can:

- Access and obtain a copy of your data on request.
- Require the Company to change incorrect or incomplete data.
- Require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.
- Ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or whether not your interests override the Company's legitimate grounds for processing data.
- Receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.
- Where we rely on consent, you have the right to withdraw that consent at any time.

Object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact the App Administration team at email address [NotifyMBSE@MBSECO.UK](mailto:NotifyMBSE@MBSECO.UK).

If you believe that the Company has not complied with your data protection rights, you have the right to complain to the Information Commissioner. However, if you do have a complaint, we ask that you please address it to us first, as we would welcome the opportunity to try to resolve your query.

## 10. What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company for the App process. However, if you do not provide us with some information, you will not be able to use the App and the Company will not be able to process your potential App Notifications.

### 11. Automated Decision-Making and Profiling

Your personal data will not be used for automated decision-making and/or profiling.

### 12. Contact Information

Questions, comments and requests regarding this Notice may be emailed to [NotifyMBSE@MBSECO.uk](mailto:NotifyMBSE@MBSECO.uk) or sent by post to Lakeside Road, Colnbrook, Slough, England, SL3 0EL

### 13. Definitions

The following terms used within this Notice and defined as follows:

**“Account Data”** mean data collected in order to maintain your account (e.g. name, contact details, email address, mobile telephone number, Job title Unique mobile telephone handset ID code, the date/time when your account was created technical data etc.

**“Controller”** means the natural or legal person, public authority, agency, or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by national or EU laws or regulations, the controller or the specific criteria for his nomination may be designated by national or EU law.

**“European Economic Area”** or **“EEA”** means the Member States of the European Union, plus Norway, Iceland and Lichtenstein.

**“GDPR”** means, as applicable, (a) the EU General Data Protection Regulation 2016/679 (the “EU GDPR”) and (b) the EU GDPR as amended and incorporated into UK law under the UK European Union (Withdrawal) Act 2018, if in force (the “UK GDPR”), together the “GDPR”.

**“Personal data”** means any information relating to an identified or identifiable natural person (also referred to as ‘Data Subject’); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**“Product Related Data”** means data provided through the App by you and which will typically relate to issues/reports relating to our products. It may also include personal data (including the name of the individual making a report.

**“Database”** refers to the structured set of data collected via our users and admins of the app, about our users and equipment used.

**“Notification”** or **“app notification”** the ticket/“*notification*” a user will create and submit to MBS to notify us of any defects, support, or feedback on the service they have received.

