

HNA FACILITIES

Policy Statement Introduction

HNA Facilities is a leading supplier of specialised vehicles to the television and film industry in the UK and Europe. We work across the media industry supplying vehicles to dramas, live sporting events, feature films and advertisements. We work with many Private, Public, and Third Sector organisations and individuals including production companies and television networks, as well as to other facilities providers who facilitate our services.

Providing a full service to cast and crew involves trust. We take that duty very seriously. Trust is fundamental to everything that we do, and one aspect of that trust is the security and privacy of all personal data.

This statement gives an overview of our commitment to you and shows how we fulfil our responsibilities under the relevant legislation including the UK's Data Protection Act (DPA) and the EU's General Data Protection Regulation (GDPR).

Personal Data Held

- Our overriding principle is that we treat all personal data as confidential.
- We comply with all relevant legislation including the DPA & GDPR. Our Data Protection Officer is responsible for implementing policies to ensure legal compliance and to ensure that we maintain the high standards of confidentiality, privacy and security necessary to maintain the trust of our customers and all others with whom we work.
- We are registered with the Information Commissioner's Office (ICO) as a Data Processor. Customer Number 00010156623.
- The personal data we gather is required to fulfil our services. For customers and potential customers, we gather the data relevant to processing their orders and managing accounts such as name, address, email, phone numbers and website. This data is provided by our customers, suppliers and other affiliates related to providing the services.
- Reflecting the diverse nature of our customer base and the other contacts with whom we work, we hold 'company contact' information relating to the legal/billing entity with whom we trade. We also hold 'person contact' data relating to individuals within the organisation with whom we interact. (NB where we trade with a private individual, the company contact data may be the same as for the person contact.)
- We typically obtain data directly from our customers and contacts by phone, email or in person. We also obtain data from enquiries, responses to marketing campaigns and publicly available sources.
- We do not hold data on children.
- Personal data and consent information is held primarily on our Outlook Email system. and is subject to our policies and safeguards.

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Use of Personal Data

- We use personal data to provide our services effectively and efficiently. This includes sending quotes, orders, invoices & statements, usually by email and resolving any queries. We will contact the relevant person using the most appropriate means in the circumstances. We may take photographs of our vehicles on a unit base to demonstrate fulfilment or show any issues identified. We use the data for processing payments and conducting credit checks where applicable.
- We do not provide personal data to any third parties except where necessary to fulfil orders. Any subcontractors with whom we may share personal data have contractual obligations to meet our safeguarding requirements. We may also share personal data with relevant authorities where required by law but only to the extent required.
- Personal data unrelated to the customer that is shared with us purely to fulfil orders, such as access contact information, is treated confidentially. We will not use this for any other purpose.
- Before sharing any personal data in the instances above, we will ensure that the other party is compliant with the regulations and our policies. Personal data is provided only where it is needed and on the basis that no consent is given to hold the data beyond the transaction in question or to use it for any other purpose.
- Where the required consent has been given, HNA Facilities may use your data for basic sales or marketing. We do not share any personal data with any third parties for marketing except outsourced marketing on our behalf and subject to our controls.

Your Consent

- We will not hold any personal data on you without your consent. If you withdraw your consent to hold a particular item of personal data, it will be amended or deleted as requested. If you request to remove all personal data, all records will be deleted at the next routine cleansing.
- We hope that you will consent to allow us to use your data occasionally for selected marketing purposes that are relevant to you. If so, we will ask you to specify the communication means you consent to receive. (As mentioned, any such communication will come only from us.)
- If you are unwilling to receive any marketing information from us at all, you may still allow us to hold the data purely for transactional purposes. In this case, we will communicate with you only in relation to orders or enquiries you place and related accounting matters.

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Your rights

Subject to any legal requirements, you have the following rights:

- To be informed whether we hold any personal information about you;
- To be informed of the personal information we hold;
- To correct your data or change your consent to what personal data is held or how it is used.

Amending and updating your personal data

- We are obliged to keep personal data accurate and current. We wish to do this in any event to ensure that any correspondence is effective and to help us provide our services efficiently.
- Please notify us of any change to your personal data or consent to either your 'person contact' information or any related 'company contact' data that you are authorised to amend.
- To amend any data or consent, please send an email to accounts@hnaway.co.uk specifying the change required. This enables us to confirm your identity.
- If you do not have access to email, please write to us at James Nasmyth Way, Eccles, M30 0SF or call 0161 707 6443. We will then contact you to verify your identity before making any change.

Questions

- If you have any questions regarding your data or our policies relating to privacy and personal data security, please contact us using the methods above. We will respond within 7 days.
- If we have any questions regarding your status or requests, we will contact you to clarify them.

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FAQs - how we're asking for your consent

- When? Now. We are now contacting all our customers, suppliers and any other contacts in our system to obtain their consent to hold their personal data and permission to use it as required by GDPR.
- How? Email. Where possible, we will do this by email sent from our Data Protection Officer using our mark@hnaway.co.uk address.
- To give or withdraw consent? To be compliant, we are inviting the contacts to opt in or out by clicking a link in the email sent out.
- Why a link? To ensure we have valid consent as required by GDPR, the link allows you to select the relevant options. An email does not give the necessary detail and may require further correspondence or discussion.
- The link will be unique to your email so we can ensure your personal data is kept secure. Please do not forward it.
- Please use the link even if you wish to withdraw your consent so that we do not trouble you with reminders.