Privacy notice - Morgan Fuels

Introduction

At Morgan Fuels Ireland and Morgan Fuels & Lubes Ltd we respect your privacy. When you use our services, you are trusting us with your information. We have implemented a privacy policy to outline to you how we treat your personal information.

We are committed to protecting your privacy of the information that you provide us, including your personal data. This policy highlights the types of personal data we collect and how we use that data.

To ensure we are fully compliant with GDPR, please find our updated policy below.

This policy is correct as of 25 February 2019. We reserve the right to change the policy at any time.

What is GDPR?

The General Data Protection Regulation, or GDPR, is the new data protection legislation replacing the Data Protection Act 1998.

It's a European Union regulation which aims to give people more control over how their personal data is collected, used, stored and shared. It's designed to strengthen and unify the data security measures of businesses in the European Union.

At Morgan Fuels, we ensure that data protection is of the upmost importance in our business for both the customer and employees.

GDPR provides you with the right to

- Be informed
- Be forgotten
- Object to data being held or processed
- Correct the information held about them
- Portability of their data

What does this mean?

Be informed: It's all about transparency. We'll tell you who in the organisation is the data controller and give you their contact details. This is the person responsible for ensuring data is used and stored correctly. Our customers have a right to be told about what data we hold on them, how their data is used, why it's used and who it's shared with.

Be forgotten: Our customers have the right to ask for their data to be deleted. But, we may not always be able to do this when we're required by law to keep information for a certain period of time.

Object: Our customers can object to their data being used for certain purposes or processed in a certain way. This could be, for example, objecting to direct marketing. It's not always possible for us to follow an individual's request though – especially where we have a legal obligation.

Correct: If we hold inaccurate information about a customer, they have a right to request it is updated.

Portability: Our customers have the right to ask for their data in a portable format so that it could be transferred to another organisation.

You have the right to request access to the data we hold on you. If you wish to do so please contact us:

Data Protection Team

Morgan Fuels & Lubes Ltd

254 Dublin Road, Newry

Co down

BT35 8RL

Email: info@morganfuels.com

Phone: 028 30 849 148

We will respond to all requests within 31 days. In most cases you will not be charged for this. However, where the request is excessive, we may charge a "reasonable fee" for the admin costs of complying with the request.

Morgan Fuels Group Privacy Policy

This privacy policy sets out:

- What information Morgan Fuels and Morgan Fuels & Lubes Ltd from you and why;
- How Morgan Fuels and Morgan Fuels & Lubes Ltd uses and protects any information that you give; and
- How you can access and manage your information.

Morgan Fuels and Morgan Fuels & Lubes Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement.

What we collect

We may collect the following information:

- Name
- Contact information including email address
- Other relevant personal information (e.g. date of birth)
- Demographic information such as postcode, preferences and interests
- Other information relevant to customer offers and/or surveys
- In the case of job applicants, CVs and references relevant to the role that you are applying for

Ordinarily we will be the party collecting your information directly from you. However, there may be situations where this information is obtained by us from third parties or that we may need to pass your information to third parties. Examples of this would include:

- HMRC
- Third party,
 - o In the case of job applicants, from a third-party recruitment agency
 - o Credit checks (fuel card applications)
 - Insurance providers (fuel card applications)
 - Debt collectors

What we do with the information we gather

We require it for the following reasons:

- Internal record keeping and account management purposes (e.g. verifying your identity and fulfilling orders you place for any of our products)
- Providing you with the product or service you have requested from us
- Monitoring, recording and storing telephone or email communications for the purpose of internal training, audit and compliance checking, to improve the quality of our customer service and in order to meet any legal and regulatory requirements
- Improving our products and services
- Contacting you by email, SMS, phone or mail for the purpose of account administration and/or processing and fulfilling orders and/or taking payment for such orders
- Customising our website according to your interests
- Reviewing your job application for roles with us and potentially offering you employment as a result of that review
- Contacting you on the grounds of us having a legitimate interest to do so, if you are a current customer, to periodically send promotional mails or contact you by telephone about new products, special offers or other information which we think you may find interesting using the contact details which you have provided
- Where you give us your consent to do so, we may periodically send promotional emails or SMS messages about new products, special offers or other information which we think you may find interesting using the contact details which you have provided
- •Use your information to contact you for market research purposes

You are entitled to request that we erase your personal information at any time. Where we have asked for your consent to use your personal information for a particular purpose, this consent may be withdrawn by you at any time. Similarly, where we are using your personal information to fulfil a legitimate interest of ours, you may have a right to object to your personal information being used for a particular purpose (e.g. for direct marketing). Please see the section entitled 'Controlling your personal information' below. Whilst we will generally seek to comply with your request, there will be circumstances where we are entitled to retain such personal information (e.g. in respect of legal claims or to ensure that any activity on your account (e.g. monies owing) may be resolved).

Account Security

If you contact us or we contact you, we may ask for certain information from you to confirm your identity, check our records and deal with your account efficiently and correctly.

We aim to protect all of our customers from fraud. As part of this, we may use your personal information to verify your identity to help prevent or detect fraud.

What lawful basis we process your information on

We may only process your personal information where we have a lawful basis for processing it. What this lawful basis is will depend on the type of personal information you provide, and where we want to process personal information for a specific purpose not identified in this Privacy Policy we will notify you of this at that time.

Consent

In certain circumstances, we may be required to process your personal information in order to comply with a lawful obligation on us. This may be the case, for example, where a statutory or regulatory body requests such information in accordance with their legal powers. We also have a legitimate interest and, on occasion, a legal

obligation to disclose personal information to regulatory bodies in certain circumstances, including where we have information about potential criminal acts or security threats, and may disclose information to authorities on this basis.

*If you proactively contact us to enquire about becoming a customer of ours, we will treat you as a current customer for the purpose of potentially directly marketing to you on the grounds set out above.

Security

The security of your information is very important to us. As part of our commitment to keeping your data safe, our experts continuously review procedures to ensure we are up to date and keep safe the information we collect online.

Only authorised employees and carefully checked third parties who provide a particular data processing service for us, are permitted access to your data. These people will only be allowed access to your data for the purposes identified within this Privacy Policy/

Where a third party is processing your data on our behalf, we will take steps to ensure that such third party gives us commitments that it will process your data in line with EU law. If a third party processing your data on our behalf is located in a non-EU country, we will ensure we take extra steps and that a formal legal agreement is put in place by the third party.

How long we hold your information for

The time period for which we keep information varies according to what we use the information for. Unless there is a specific legal requirement for us to keep information, we will keep your information for as long as it is relevant and useful for the purpose for which it was collected.

Where we are using your personal information to send you marketing info we will generally retain that data for marketing purposes for a longer period of time as due to the nature of our business we frequently see repeat purchases from customers over a more prolonged irregular time frame. We will retain your account information for six years in line with relevant tax and contract requirements. In the case of commercial customers, we may retain personal information relating to such individuals within such customers for a longer period of time depending on the order and contracting cycles of such customers

Controlling your personal information

You may choose to restrict or control the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website or elsewhere, ensure that you tick any box requesting permission to use your personal information for specific purposes (e.g. marketing) if you wish to opt in
- If you believe that we are holding personal information which is incorrect, out of date or incomplete and wish for that to be corrected
- If you wish for your personal information to be erased from our systems
- If you wish for us to transfer your personal information to a third party (e.g. another service provider), we may provide you with your personal information which held by us for you to pass to that third party

Where you have opted in to marketing, we may direct market to you by post or telephone on the basis that we consider we have a legitimate interest in marketing to you in this way and that it does not substantially impact on your privacy. You have a right to object to this at any time, and may request that we cease to contact you for direct marketing in this manner at any point. We will comply with any such request.

We will not sell, distribute or lease your personal information to third parties for their control unless we have your permission, need to do so in order to fulfil a contractual obligation to you or are required by law to do so.

If you believe that any information, we are holding on you is incorrect, out of date or incomplete, please write, email or call us as soon as possible, using the details set out above. We will promptly correct any information found to be incorrect. To protect your privacy and security, we will take reasonable steps to verify your identity before granting access or making corrections.

Website Information

We use programs such as Google Analytics to help us find out:

- How many people visit our websites
- Which pages and parts of pages are most popular
- How long people spend in each area of the website
- What information people are looking for

These insights help us understand what customers want from our website and, consequently, how we can improve the website in the future.

Google Analytics uses cookies to collect non-personally identifiable information like:

- Browser types
- Operating systems
- Third party sites that direct you to us
- The time and date of a visit

Cookies

Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website, and can be accessed either by the web server or the client computer. This allows the server to deliver a page tailored to a particular user, or the page itself can contain some script which is aware of the data in the cookie and so is able to carry information from one visit to the website (or related site) to the next.

For Morgan Fuels, cookies remember whether you visited the site before, so that you remain logged in – or help us work out how many new visits we receive each month. They don't include personal information about you.

How to Contact Us:

If you have any questions about this policy or more generally about our use of your personal information, you may contact us.

Morgan Fuels

254 Dublin Road, Newry. Co Down. BT35 8RL 028 30 849 148 info@morganfuels.com