

Data Protection Policy

T H WHITE respects your privacy and is committed to protecting personal data. This Data Protection Policy explains how we look after personal data, communicate privacy rights and how the law protects you.

Purpose and Scope

This policy applies to data subjects and anyone working with personal data that is controlled or processed by or on behalf of T H WHITE including and not limited to employees and service providers. The T H WHITE Group of companies, defined as T H WHITE above comprises of T H WHITE Holdings Ltd, T H WHITE Ltd, T H WHITE Installation Ltd, T H WHITE Machinery Imports Ltd and their respective trading brands, including Palfinger UK.

This policy provides information on how T H WHITE collects and processes personal data, including data you may provide when signing up for services or engaging with the businesses in T H WHITE Group.

In compliance with the Data Protection Act and General Data Protection Regulation (GDPR) we ensure personal data is:

- Processed fairly and lawfully and in a transparent manner
- Obtained for one or more specified, explicit and lawful purposes
- Adequate, relevant and only limited to what is required
- Accurate and where necessary kept up to date
- Not kept in a form which permits identification of data subjects for longer than is necessary
- Processed in accordance with the rights of data subjects
- Processed in a manner that ensures appropriate security of the personal data.

Such personal data will always be kept safe and secure, including at the office, public areas, home or in transit.

Controller

T H WHITE is the data controller and responsible for your personal data (collectively referred to as "T H WHITE", "the Company", "we", "us" or "our" in this notice).

The Data We Collect About You

Personal data is information that can identify an individual. We may collect the following categories:

- **Identity Data:** name, title, date of birth, gender
- **Contact Data:** address, email, phone number
- **Marketing and Communications Data:** marketing preferences

We may also collect anonymised statistical or demographic data (Aggregated Data). If it can identify you, we will treat it as personal data.

Special categories of data are by nature more sensitive than other data and as such, where there is a need to collect this, it is given the extra protection required under GDPR and Data Protection legislation.

How Is Your Personal Data Collected?

We collect data directly from you when you fill out forms, contact us via phone, email, post or otherwise interact with us.

How We Use Your Personal Data

We only process your personal data when legally permitted. Common reasons include:

- To perform a contract of sale with you
- To meet our legitimate business interests, balanced against your rights
- To comply with legal obligations

Operationally we do not generally rely on consent except for marketing communications, which you can opt out of at any time. Our data collection uses are in the interests of developing and maintaining a mutually beneficial customer relationship.

Purposes for Using Your Personal Data

We use your data to:

- Deliver products or services you request
- Maintain equipment servicing records
- Send reminders (e.g. renewals, updates)
- Share relevant marketing communications

You may opt out of marketing communications at any time. This does not affect important notices such as service reminders or information on safety and legislative issues relating to a product you own/have purchased from us. These communications will continue when relevant even if you have unsubscribed to marketing.

Change of Purpose

Your data will only be used for the original purpose unless deemed compatible. For substantially different uses, we will notify you and explain the legal basis.

Disclosures of Your Personal Data

T H WHITE does not sell, rent, or lease personally identifiable information to others. Unless required by law, personal data is only shared with closely related entities and/or business partners acting on T H WHITE's behalf for the purposes of delivering services and performing our duties. For example, product registration and warranty information may be shared with a supplier whose products have been sold to a customer. We do not use or share personally identifiable information in ways unrelated to those described without permission unless there is a legal obligation for us to share.

All third parties are required to handle your data securely and legally.

International Transfers

If your data is transferred outside the UK/EEA, we ensure a similar degree of protection is afforded to the data, using safeguards such as:

- Adequacy decisions to the UK/EU
- Standard contractual clauses
- Privacy frameworks (e.g., EU-US Privacy Shield Data Privacy Framework)

Contact us for further information on safeguards.

Data Security

We implement security measures to protect your data from loss, misuse or unauthorised access. Access is limited to those with a legitimate business need and is governed by confidentiality obligations. We have procedures to handle data breaches and will inform you and regulators where legally required.

Data Retention

We retain your personal data only as long as is necessary for business, legal, or reporting requirements.

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 requirements.

We may anonymise data for statistical purposes, allowing indefinite use without further notice. You may request deletion of your data; however, legal or contractual obligations may prevent total or immediate erasure in some cases.

Your Duty to Inform Us of Changes

Please ensure your personal data is accurate and up to date by informing us of any changes during your relationship with us. If required data is not provided, we may be unable to fulfil a contract or service you have requested from us.

Cookies and Third-Party Links

T H WHITE's websites use cookies to collect technical data about users' browsing behaviour, to improve functionality, personalise experiences, and analyse traffic. Users can choose to accept or decline cookies through their browser settings.

Our websites may include links to third-party websites, plug-ins, and applications. Clicking on these links or enabling these connections may allow third parties to collect or share data about visitors. These sites operate independently, and we are not responsible for their privacy practices. Please review their privacy notices.

Training

Data protection training is important so that all staff understand their responsibilities. All our staff must complete mandatory e-learning training periodically. Serious breaches of this policy caused by deliberate, negligent or reckless behaviour could result in disciplinary action and may even lead to criminal prosecution.

Your Legal Rights

You have the right to:

- **Access** your data
- **Correct** inaccuracies
- **Request erasure** under certain circumstances
- **Object** to certain uses of your data
- **Restrict** data processing in specific scenarios
- **Request data transfer** to another party
- **Withdraw consent** where applicable

We may need to verify your identity before fulfilling these requests.

Subject Access Requests (SARs)

We recognise SARs are a right provided in the Data Protection Act and will ensure that all requests from individuals to access personal data are dealt with as quickly as possible and within the timescales allowed in the legislation. We aim to respond within one month. Complex requests may take longer, but we will keep you informed.

No Fee Required

Requests are generally free unless excessive or repetitive.

Human Resources Data Storage

By law, we are required to keep personnel records relating to tax (PAYE) and payroll for specific periods of time, even after employees may have departed T H WHITE. We follow strict guidelines relating to staff data:

- We keep records for as long as there is a genuine need, either practically or for compliance reasons for instance for insurance or health and safety reasons.
- Pension records are kept longer, as these may be required for a very long period into the future.
- We follow CIPD guidelines on destruction of personnel records.

Most personnel records are now kept centrally and electronically. When created, these are securely stored electronically with strict limitations on access by authorised persons only. Questions relating to personnel records should be directed to hr@thwhite.co.uk.

Complaints

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk. However, we would appreciate the opportunity to address your concerns before you contact the ICO so please address a complaint to our Data Privacy Officer in the first instance.

Our Data Privacy Officer oversees compliance with this policy. If you have any questions or wish to exercise your legal rights, please contact:

Name: Kate Draper

Email: kld@thwhite.co.uk

Postal Address: T H WHITE, Nursteed Road, Devizes, Wilts, SN10 3EA

Policy Review

This policy is reviewed annually considering changes in legislation, best practice, lessons learnt and input from IT and Communication areas of the T H WHITE Group.

If you wish to exercise any of your rights or have any concerns about your personal data, please contact our Data Privacy Officer in the first instance: **Kate Draper**, at T H WHITE, Nursteed Road, Devizes, Wilts, SN10 3EA.

Document Control version history

Version	Status	Date	Author	Summary of changes
1.0	Obsolete	Aug 2018	Peter Barker	
1.1	Obsolete	Aug 2023	Kate Draper	Contact updates
1.2	Obsolete	May 2025	Ken Ash	Updated dates
1.3	Live	July 2025	Kate Draper	Refresh all sections

Reviewers

Name	Role	Business Area
Alex Scott	CEO	T H WHITE Group

Management Approval

Name	Date	Version Number
Divisional Directors Group	Aug 2023	1.1
Divisional Directors Circ	Jun 2025	1.3

Distribution

Name	Organisation Department	Format
All	T H WHITE Group of Companies	PDF document via website