GDPR COMPLIANCE PROGRAMME

PRIVACY NOTICE

NOT-01 | How EMS uses your personal data

Data Controller	Equipment Management Solutions Group and its subsidiaries
Belfast Address	75b Sydenham Road, Belfast, Northern Ireland, BT3 9DJ
Halifax Address	First Floor West, Bowling Mill, Dean Clough, Halifax, HX3 5AX
Websites	www.emspalletmanagement.co.uk | www.emspalletmanagement.com
DPO Contact	Craig Lodge — compliance@ems-pm.com
ICO Registration	ZB872523
Supervisory Authority	Information Commissioner's Office (ICO), UK
Version	2.0 | June 2026
Last Updated	June 2026
Next Review	June 2027

1. Who We Are

Equipment Management Solutions Group and its subsidiaries ('EMS', 'we', 'our', 'us') is a data controller registered with the Information Commissioner's Office (ICO) under registration number ZB872523.

We operate the following websites: www.emspalletmanagement.co.uk | www.emspalletmanagement.com

Our principal registered office is at First Floor West, Bowling Mill, Dean Clough, Halifax, HX3 5AX. Our Belfast operations are based at 75b Sydenham Road, Belfast, Northern Ireland, BT3 9DJ.

If you have any questions about how we use your personal data, please contact our Data Protection Lead: Craig Lodge at compliance@ems-pm.com.

2. Personal Data We Collect

Category	Examples	How Collected
Contact Information	Name, email, phone, postal address, company name, job title	Contact forms, email, telephone enquiries
Technical Data	IP address (anonymised), browser type, device, operating system	Automatically via website technology
Website Usage Data	Pages visited, session duration, traffic source, clicks	Analytics tools (with your consent)
Enquiry Data	Content of messages, quote requests, service enquiries	Website contact forms, email
Recruitment Data	CV, employment history, qualifications, references, right to work	Job applications via website or email
Business/Account Data	Client company details, service history, correspondence records	During service delivery via PalletPortal and email

3. Why We Use Your Personal Data

Purpose	Legal Basis	Details
Respond to enquiries and provide services	Contract / Legitimate Interests	Managing client and prospect relationships via M365 and PalletPortal.
Deliver pallet management and equipment services	Contract (Art.6(1)(b))	Core service delivery via PalletPortal 2.0 (Atto Partners).
Financial administration	Legal Obligation (Art.6(1)(c))	Invoicing and payments via Xero; HMRC compliance.
Website analytics and improvement	Consent (Art.6(1)(a))	Analytics tools enabled only with your cookie consent.

Purpose	Legal Basis	Details
Marketing communications	Consent or Legitimate Interests	With your consent, or where we have an existing relationship.
Recruitment	Pre-contractual (Art.6(1)(b))	Assessing your application. Unsuccessful applications retained 6 months.
Security and fraud prevention	Legitimate Interests (Art.6(1)(f))	Protecting EMS systems. Monthly phishing simulations and endpoint protection.
Legal and regulatory compliance	Legal Obligation (Art.6(1)(c))	HMRC, employment law, H&S, ICO obligations.

4. Who We Share Your Data With

We only share personal data where necessary. Recipients include:

- Brighouse Computer Centre — our outsourced IT support provider, who manages our systems and infrastructure;
- Atto Partners — who host and develop PalletPortal 2.0, our core operational platform;
- Microsoft Corporation — who provide Microsoft 365 (email, Teams, SharePoint, Intune);
- Xero — our cloud accounting platform for invoicing and financial records;
- Cisco Webex — our telephony provider;
- Professional advisers (lawyers, accountants, auditors) — under confidentiality obligations;
- The ICO, HMRC, or other regulators — where required by law.

We do not sell, rent, or trade personal data to any third party for their own commercial purposes.

5. International Transfers

Most of your personal data is stored within the UK or EEA. In limited cases, data may be processed outside the UK, including by Xero (New Zealand — adequacy decision) and Cisco Webex and Notion (USA — Standard Contractual Clauses). Appropriate safeguards are in place in all cases. Contact compliance@ems-pm.com for details.

6. How Long We Keep Your Data

Data Category	Retention Period
Client contact and service data	3 years post-contract
Financial / invoice records	6 years (HMRC requirement)
Website enquiry data	1 year from last contact
Website analytics	26 months (anonymised at 13 months)
Recruitment (unsuccessful)	6 months from decision date
General correspondence	1 year

7. Your Rights

Right	What It Means
Access	Request a copy of personal data EMS holds about you. Email compliance@ems-pm.com.
Rectification	Ask us to correct inaccurate or incomplete personal data.
Erasure	Ask us to delete your data where there is no compelling reason to continue.
Restriction	Ask us to pause processing in certain circumstances.
Portability	Receive your data in a structured, machine-readable format.
Object	Object to processing based on legitimate interests or for direct marketing.
Withdraw Consent	Where we rely on consent, you may withdraw at any time via compliance@ems-pm.com.
Complain	Contact the ICO: ico.org.uk | 0303 123 1113. ICO Registration: ZB872523.

To exercise any right, contact Craig Lodge at compliance@ems-pm.com or write to: Data Protection Lead, Equipment Management Solutions Group, First Floor West, Bowling Mill, Dean Clough, Halifax, HX3 5AX. We will respond within one calendar month.

8. Cookies

Our websites use cookies. Please see our Cookie Policy at www.emspalletmanagement.co.uk | www.emspalletmanagement.com for full details. Non-essential cookies (including analytics) are only set with your consent via our cookie consent banner.

9. Changes to This Notice

We may update this Privacy Notice periodically. The current version is always available on our websites. Material changes will be prominently flagged.

END OF PRIVACY NOTICE