



Privacy Notice

Updated: 08/01/2019

This privacy policy applies to your use of the website of Acorn Mobility Services Limited ("Acorn Stairlifts"). It also applies to Acorn Stairlifts provision of products and services to you and/or where you generally provide us with personal information. This privacy policy explains how we, (Acorn Mobility Services Limited, a company incorporated in England and Wales under number 02593771, whose registered office is at Telecom House, Millennium Business Park, Steeton, West Yorkshire BD20 6RB) collect, share and use your personal information.

Our commitment to you.

The protection of your personal information is important to us. We respect your privacy and want you to understand what we do with the information that we hold about you.

Generally, you can browse through our website without giving us any information about yourself (including your email address).

When we do need your personal information to provide services that you request or when you choose to provide us with your personal information, whether in connection with a contract with us for services or otherwise through your interaction with us, this policy describes how we collect and use your personal information. To make this notice easy to find, we make it available on our homepage and at every point where personally identifiable information may be requested.

What personal data do we collect

We may collect the following personal information from you when you use Acorn Stairlifts products or services:

- **Contact details** – Information that enables us to contact you directly, such as your name, email address, telephone number and addresses.
- **Transaction information** – Details of the Acorn Stairlifts products and services that you purchase from us, including service plans.
- **Payment information** – Debit card details and/or bank account details that you provide in order to make payment for any Acorn Stairlifts products and/or services that you purchase from us.
- **Installation and service history information** – Details relating to the installation of Acorn Stairlifts products at your home or property and in relation to the servicing of that product.

- **Device information** – Information about any smartphones, mobiles or other electronic devices you may use to connect to your Acorn Stairlifts product. This may include details about the type of the device, its operating system, and applications on the device. It may also include details of your mobile network and your IP address.
- **Customer service information** – A record of any queries or complaints that you may send to us by email, phone or any app-messaging feature.
- **Product use information** – Information about how you are using Acorn Stairlifts products in your home and the performance of those products.
- **Location information** – Information about the exact location of your Acorn Stairlifts product. We may also collect information about the location of your mobile device, for instance if your mobile device connects to your Acorn Stairlifts product.

You are not required to provide any of the personal information set out above to us although if you do not do so, the functionality of your Acorn Stairlifts product may be reduced.

Sources of personal information

We will collect personal information from various sources, including:

- From you;
- From our website;
- From Acorn Stairlifts products; and
- From other companies that we use to help us to provide services to you, who provide us with information to help us to develop and improve our products and services.

Use of information we collect

We will use your personal information and device information for several general purposes including:

1. Supplying and delivering products and services, including installation and servicing to you;
2. Administering our contracts with you;
3. Answering your queries or complaints, or fulfilling any requests for information or services placed by you or your authorised contacts/persons;
4. Keeping you up to date with news about Acorn Stairlifts, our products and services;
5. Providing other information to you which we think you may find of interest, and for any other purposes set out in any contract you have with us for services;
6. To help us better understand how Acorn Stairlifts products are used and to maintain, develop and improve Acorn Stairlifts products and services;
7. To investigate any misuse of your account, fraud and debt collection; and
8. For the establishment, exercise or defence of legal claims.

Who we share your personal information with

Your personal information may be processed by us, by other companies within our group and by selected third parties processing data on our or our group companies'

behalf, for the purposes of providing a service to you and understanding your use of Acorn Stairlifts products and services, in accordance with this privacy notice.

We do not forward your personal information to third parties for marketing purposes. We may send marketing information to you, on behalf of selected third parties, about products that we think will be of interest to you.

We share personal information with installers and service engineers so that they can provide you with installation and product maintenance services.

We will share personal information with the Government or regulators, where we are required to do so by law or to assist with their investigations, and with the Police to assist with the investigation and prevention of crime.

Personal information may be transferred to and stored in countries outside the European Economic Area. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy policy and is kept secure. Personal information will not be sold or transferred to other unaffiliated third parties without your prior consent.

Where any personal information is processed by us, we will comply with relevant Data Protection legislation at all times. We are registered to process information under the Data Protection Act (our registration number is Z7645905 and you may refer to the Office of the Information Commissioners website for further information at www.ico.org.uk

Legal basis for the processing of personal information

We collect and use customers' personal information where it is necessary for: -

- the pursuit of our 'Legitimate Interests'
- the performance of a contract or complying with other legal obligations.

Our Legitimate Interests:

- Operating Acorn Stairlifts' business of selling and supplying products and services to our customers
- Promoting, marketing and advertising our products and services
- Improving our range of products
- Creating and developing new products and continually improving product safety
- Preventing, investigating and detecting crime, fraud or anti-social behaviour
- Handling customers contacts, queries, complaints or disputes
- Handling legal claims or regulatory enforcement actions taken against Acorn

Where you have given your consent for us to process your personal information, you have the right to withdraw your consent at any time.

Retention

We will keep your information for as long as you maintain an account with us. After you close your account with us, we will keep your personal information for a reasonable period to maintain our records and fulfil our legal obligations to you.

We may also retain your information if required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse or enforce Terms and Conditions. Information may be retained for these purposes even after you have closed your account with us or it is no longer needed to provide the services to you. Where consent is the only legal basis for processing, we will cease to process information after consent is withdrawn.

Security measures

We are serious about guarding the security of your personal information that we have under our control from unauthorised access, improper use and disclosure, unauthorised destruction or accidental loss. However, we cannot guarantee the protection of your personal information in relation to use of our website as, due to the nature of the Internet, the website is theoretically accessible by any user of the World Wide Web. You should be aware that when you disclose personal information on the website it may be collected by another user and may result in unsolicited messages from other Internet users.

Cookies

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

You can find out more information about cookies and the cookies we use in our [Cookie Policy](#).

Your rights in relation to your personal information

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email privacy@acornstairlifts.com or use the information supplied in the Contact us section below. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

The right to be informed

We are obliged to provide clear and transparent information about how your personal information is being used. This is provided by this privacy policy and any related communications we may send you.

The right of access

You may request a copy of the personal information we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal information we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data information
- e) When personal information has been collected from a third party, the source of the personal information

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

The right to rectification

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this information. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

The right to erasure (the 'right to be forgotten')

Where no overriding legal basis or legitimate reason continues to exist for processing personal information, you may request that we delete the personal information. This includes personal information that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

The right to restrict processing

You may ask us to stop processing your personal information. We will still hold the information, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal information is contested
- b) Processing of the personal information is unlawful
- c) We no longer need the personal information for processing but the personal information is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

The right to data portability

You may request your set of personal information be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

The right to object

You have the right to object to our processing of your information where

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research;
- Processing involves automated decision-making and profiling.

Changes to this policy

We may change this privacy notice from time to time. When such a change is made we will post a revised version on the website. Where required by law, we will seek your consent to changes in the way we use your personal information. Your continued use of the website will indicate your agreement to any such change.

Contact

If you have any further enquiries or concerns about our privacy notice or wish us to remove you from our system please email us at privacy@acornstairlifts.com or

write to The Data Protection Officer, Acorn Mobility Services Limited, Telecom House, Millennium Business Park, Steeton, West Yorkshire BD20 6RB.

Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner. Should you feel unsatisfied with our handling of your information, or about any complaint that you have made to us about our handling of your information, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the United Kingdom, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us/>.