

This is the Privacy Statement of TRP Ireland (“TRP”) a brand name of DAF Distributors Ireland Limited (“DDI”) In this statement we use the terms “we”, “our” and “us” to refer to TRP.

The purpose of this Privacy Statement is to outline TRP position concerning the collection, use, retention, disclosure, and transfer of Personal Data which is gathered and processed by TRP. This Privacy Statement also sets out the TRP information management practices.

TRP respects the privacy of all those individuals whose Personal Data it encounters, which in particular includes the following:

- a) All users of the TRP Websites, Social Media Pages or Apps;**
- b) TRP employees and contractors (including applicants for employment with TRP);**
- c) All members (including former employees) of TRP on sponsored pension schemes;**
- d) TRP business contacts and suppliers;**
- e) All Customers or prospective customers of TRP.**

For each of these categories of individuals, this Privacy Statement will explain why TRP collects and how TRP uses the Personal Data it collects. TRP will ensure that it keeps all Personal Data provided to it in accordance with TRP obligations under applicable data protection laws. TRP will update this Privacy Statement from time to time to reflect any material changes in technology, legislation or TRP data use practices which may materially affect the way in which TRP processes Personal Data.

This is not an exhaustive statement of all TRP data protection practices and TRP may apply specific policies within certain environments. TRP might include a separate privacy notice at the point of capturing data on a new service and any specific consents obtained or information provided in this way will apply specifically to that service and will supplement this Statement.

1. What is Personal Data?

Personal Data is any information relating to a living individual that allows for the identification of that individual. Personal Data can include a name, address, contact details, an identification number, IP address, CCTV footage, access cards/co-tags, fobs, audio-visual or audio recordings of a person, details about an individual's location or any other detail(s) specific to that individual such in certain cases special category data such as (Biometric).

2. Who we are and how to contact us?

In circumstances where TRP controls Personal Data by deciding why and how that Personal Data is processed, TRP will be a "Data Controller". Any entity that processes Personal Data controlled by TRP and does so on behalf of TRP, is a "Data Processor". Data Processors may include third party service providers engaged by TRP (for example communications providers, fleet tracking, payroll and marketing or recruitment agencies). As required by applicable data protection law, when TRP appoints a Data Processor, we will ensure that appropriate contractual protections are in place.

If you have any questions about this data protection statement, including any request to exercise your legal rights, please contact us by writing to our Data Compliance Officer, OHM Group, Clonlara Rd, Baldonnell Business Park, Dublin, D22 or emailing us at dco@ohm.ie.

3. Categories of personal data and how we use it.

This section of the Privacy Policy sets out the type of Personal Data collected by TRP, the purposes for which such Personal Data is collected and processed and the lawful justifications for such processing in the context of the TRP Websites.

We also collect, use, and share aggregate data such as statistical or demographic data. Aggregate data is information gathered and expressed in a summary form for purposes such as statistical or demographic analysis. Aggregate data may be derived from your personal data but is not data that directly or indirectly reveals your identity. For example, we may aggregate your usage data of our website to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregate data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this data protection statement.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data (apart from consented employees). Nor do we collect any information about criminal convictions and offences. However, if it is necessary to collect special categories of personal information and/or criminal conviction information, we will only do so with your explicit consent and we will explain the purpose for which the information will be used at the point when we ask for your consent.

4. How we obtain your information?

We may collect your information through our website or social media platforms where you provide it to us, such as where you enter competitions with us, fill out forms, request a service from us such as a brochure or booking a test drive or contact us. We may also collect information from you at events and brand displays, such as at conferences etc.

TRP is not responsible for the privacy practices of any external websites, manufacturers or platforms which may be accessed or used in connection with a person's use of the TRP website or TRP social media pages. They are subject to their own privacy statements which may materially differ from those of TRP so users should review them for further information.

5. What Personal Data does TRP collect and use online?

TRP collects various types of Personal Data when a person uses the TRP website or TRP social media. The following are examples of Personal Data collected by TRP:

- i. Competitions: When a person enters a competition, TRP may collect and use the entrant's name and contact details (including postal address, email address, telephone number) in connection with the competition (including mobile competitions). Where TRP operates competitions in conjunction with a third-party commercial partner, subject to the competition rules and notices, that partner may collect and use the data.**
- ii. Social Media Pages: Content such as messages and photographs, that are posted on social media pages on which TRP has a presence may be made publicly available and may be used in connection with the operation and promotion of TRP social media pages, services, and the TRP website. If content is posted that is deemed to be in breach of this Privacy Policy or the policies operated by such websites or social media platforms, such content may be removed by or at the request of TRP or the operators of those social media websites. If such**

inappropriate content is posted to a social media page that TRP controls, you can report it at the following address dco@ohm.ie and TRP will endeavor to ensure that appropriate action is taken in accordance with the TRP policies and the policies of the relevant social media platforms.

- iii. TRP may record which users opened and clicked any embedded links in communications sent by TRP to measure a campaign's effectiveness. The TRP Site uses cookies, web beacons, device identifiers, social plugins, tracking pixels, etc. "Cookies" are small pieces of information stored by your internet browser that collect data such as your browser type, your operating system, web pages visited, time of visits, content viewed, advertisements viewed, and other click stream data. TRP uses cookies to help us tailor our websites to your needs, to deliver a better, more personalised service and to remember certain choices you have made so you do not have to re-enter them. Cookies also enable us to identify traffic to our website including pages visited, visitor numbers and traffic paths taken. TRP does not use deploy un-necessary cookies, such as analytics, marketing, targeting, or profiling cookies without consent. Please see our Cookie Policy for further details <https://www.trpstore.ie/cookies/>
 - iv. TRP may use advertising networks to help present advertisements or other content on our website and other websites that display TRP advertisements .Advertising networks use cookies, web beacons, or similar technologies on your computer or mobile or other device to serve you advertisements or content tailored to interests you have shown by building a profile of your internet browsing on this website and other websites you have visited.
6. The purpose and legal basis for processing your information.

TRP collects and processes the Personal Data described below for a variety of purposes. As required by data protection laws, below is a summary of these purposes and the lawful justifications that support them:

a) *To enter into and perform a contract with you.*

We may process your information in order to enter into a contract with you or to provide you with a service which you have requested from us. For example, we need to process your personal information in order to arrange parts for your vehicle or to provide you with a brochure or information about a product where you have requested it.

b) *To comply with our legal obligations*

We are required to process your personal information to comply with certain legal and regulatory obligations to which we are subject. For example, we are required to obtain certain business records in accordance with company and revenue law which may include your personal information.

c) *For our legitimate business interests*

We may use your personal information for the purposes of carrying out activities that are in our legitimate interests (or those of a third party). Where we process your information for our legitimate interests, we ensure that there is a fair balance between our legitimate interest and your fundamental rights and freedoms.

If you are a business customer of TRP, we may use your information to send you communications on products and service that may interest you and that you would reasonably expect to receive, you can at any stage easily opt out of these communications by contacting us on dco@ohm.ie

We may use your personal information to manage our everyday business needs, including accounting, internal reporting needs, and market research, to progress and respond to legal claims, security of our premises and staff through use of CCTV, to process claims, to ensure appropriate IT security and to prevent fraud, to monitor and audit warranty claims. Our legitimate interest is the effective management of our business.

We may use your personal information to send you notifications on parts orders, delivery dates and service reminders, in our legitimate interest. Our legitimate interest is connecting with our customers.

We may use your personal information in an aggregate form to classify our customers and to acquire an aggregated overview of our customer base in our legitimate interest. Such processing does not assess individual characteristics. Our legitimate interest is to grow our business, understand our customer base and provide products and services of interest to our customer base as a whole.

We may use your information which we collect, including personal information we obtain from publicly available sources such as social media, to help us understand our customers and provide products or services which may be of interest to them, in our legitimate interest. You have the right to object to this at any time by contacting us on dco@ohm.ie

We may acquire your contact data from reputable marketing agencies, which may include your personal data with the intention to provide you with information on products or services which may be of interest to you, in our legitimate interest. We will notify you of any such acquisition and you have the right to object to this at any time by contacting us on dco@ohm.ie

We may also contact you in the event of the closure of your local sites, or to give you the details of all other TRP sites available to you in our network. We do this in our legitimate interest in order to keep our customers updated of changes within our organisation.

We may provide your personal information from contact forms collected via our websites to other TRP sites outside our organisation, which are listed below. We do this in our legitimate interest to keep our customers supported by directing their requests to their preferential site location. You have the right to object to this at any time by contacting us on dco@ohm.ie

- DAF Truck Services Ltd
- Colm Burns Commercials Ltd
- Kearns and Murtagh Commercials Ltd
- Galway Truck Centre Ltd
- Interparts Drumalee Ltd
- North Dublin Commercials Ltd

d) *With your consent*

We will request your consent for the use of all cookies on our websites outside of strictly necessary. You can withdraw this consent at any time by clicking “cookie settings” at the bottom of our webpage, see our cookie policy for further information <https://www.trpstore.ie/cookies/>

e) *To protect your vital interests*

We will in certain circumstances use your personal information to protect your vital interests, for example we may contact you in the event of a significant recall or safety issue with a part provided for your vehicle.

As required by data protection laws, below is a summary of these purposes and the lawful justifications that support them:

Purpose	Description	Lawful Basis for Processing
Purchasing a Vehicle Part / Booking Vehicle Service	We may process your personal data to make a booking and send you a reminder of that booking. Or when you order a part, and we contact you to inform you that your part is available.	The processing is necessary for the performance of a contract to which the data subject is party.
Service and warranty reminders	We may use your personal information to remind you when your service is due or to advise you when your warranty is due to expire.	We rely on our legitimate interest to connect with our customers.
Marketing to Potential Customers and Customers	Information is collected by our Sales, Service, Parts and/or Marketing staff when any customer, or potential customer, contacts us.	Where you are a Business Prospect or Customer The processing is in our legitimate interests to develop our business by providing information that is relevant and where the data subject has not opted out of the processing.
Customer Satisfaction Survey	We carry out customer satisfaction surveys, by post, phone, and email to ensure we are providing a good service to customers and potential customers.	The processing is in our legitimate interests to ensure the quality of services provided by our staff.
Vehicle Tracking	We operate vehicle telematics on our Fleet Vehicles. The vehicle is tracked via GPS and location data is retained	The processing is necessary for our Legitimate Interests in protecting our employees and business assets
Quality Improvement / Staff Training	All, written communications, and communications received through the web are stored by us.	The processing is in our legitimate interests in providing a high standard of services to our customers, by assessing the ongoing development and identifying areas for improvement.
CCTV	We operate a CCTV system on our premises to protect the safety and security of our staff and property and for health and safety purposes.	The processing is in our legitimate interests as a private company regarding Health, Safety and Security.
Anti-Money Laundering	We use your personal data to comply with anti-money -laundering regulations.	The processing is necessary for compliance with a legal obligation to which the controller is subject.
Safety Incidents / Product recall	We may use your personal data to contact you regarding an urgent safety measure and / or a product recall.	The processing is necessary for compliance with a legal obligation to which the controller is subject. The processing may be necessary to support your vital interests.
Legal obligation	We may use your personal information to comply with various legal obligations to which we are subject including make a payment	The processing is necessary for compliance with a legal obligation to which the controller is subject

	of VAT or in respect of the sale vehicle parts	
	COVID 19 Contact Tracing Logs	
	COVID 19 Return to work Safely Forms	
Dealing with sales and other enquiries	To respond to correspondence, you send to us and fulfil the requests you make to us (for example brochure requests or information about specific parts or peripherals);	To takes steps prior to the entry into a contract with you and for our Legitimate Business Interests
To understand our customer base	We may use your personal information on an aggregate basis for market research purposes to help us understand our customer base	We rely on our legitimate interest in order to understand our customer base.
Business needs	We may also use your personal information to manage our everyday business needs, including accounting, sharing your information within our company group for administrative purposes, and to prevent fraud.	We rely on our legitimate interest in the effective management of our business
Website Security	To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
Website analytics	To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	With your consent where your data has been collected through our website. We use the data to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy

7. Who do we share information with?

Third party service providers

TRP discloses Personal Data to third parties in certain instances. For example, TRP uses third party service providers for the processing of Personal Data for a number of purposes, including, security service providers, consultant advisors, IT service providers, printers, debt collection agencies, valuers, marketing companies who carry out marketing campaigns, market research or customer satisfaction surveys on our behalf and providers of security and administrative services. We share your information with organisations who provide services in order for you to avail of roadside

assistance. These service providers are subject to a contractual obligation to only process Personal Data obtained from TRP for purposes to which it was obtained and in accordance with TRP instructions.

TRP will not provide your Personal Data to third parties who may contact you for direct marketing or promotional purposes unless you have consented to TRP disclosing your Personal Data to such third parties for that purpose.

In certain circumstances TRP will disclose personal data to other external third parties such as its professional advisors as necessary in the context of the performance of their services. Such recipients may include external legal advisors, auditors, actuaries, pension and tax advisors, pension administrators and other professional advisors.

Disclosure of such data will take place for a variety of reasons including in order to ensure that TRP meets its tax and other statutory obligations.

TRP may also disclose personal data to its insurance providers in connection, with legal claims and prospective legal claims or proceedings.

OHM Group and other OHM Group entities: TRP are part of the OHM Group. Where we convert your information, such as information you provide in the course of a customer satisfaction survey, into statistical or aggregate data in such a way as to ensure that you are not identified or indefinable from it, we may pass this information on to OHM Group and other OHM Group entities, such as distributors for analytical and statistical purposes.

Insurance Companies: We may pass your information to insurance companies and/or any motor assessor appointed by you or an insurance company, where any portion of the cost of the repairs or work being carried out by us on your vehicle is being covered under an insurance policy. We may disclose personal data to our insurance providers in connection, with legal claims and prospective legal claims or proceedings.

Manufacturer of Your Vehicle & Their Distributor: We may pass on your information to the manufacture of your vehicle and their distributor where we are ordering specific parts that you have requested. See below details of manufacturers and distributors;

- DAF Trucks N.V
- Interparts Drumalee Ltd

Potential sale or merger

If we sell any part of our business and/or integrate it with another organisation, your details may be disclosed to our advisers and to prospective purchasers or joint venture partners and their advisers. If this occurs, the new owners of the business will only be permitted to use your information in the same or similar way as set out in this data protection statement.

8. What type of information is collected?

As a vehicle parts reseller we need to collect many categories of personal data (about you and other parties) for the purposes set out in this Privacy Statement.

The following table is a non-exhaustive list and provides an indication of the categories and types of personal data we use to perform our duties.

Purpose	Type of Data
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Sales of Products	Name, Contact Details, Vehicle Details, Bank Details, Service History, Gender
Customer Care	Name, Contact Details, Vehicle Details, Phone Calls
Finance	Bank Details - Visa/Debit Card Details
Marketing	Name, Contact Details, Occupation, Vehicle Details, Gender, Purchase History, I.P Address, Cookie Preferences, Contact Forms
Security	CCTV Footage, I.P Address, Geo Location Data (Vehicle Tracking/Telematics)
IT Information	We collect information about your internet activity using technology known as cookies. Your consent will be required for certain cookie types. See our cookies policies on our websites for further information.

9. Storage Periods

The period for which we will keep your personal information will depend on the service you have requested from us. The retention period may be longer than the period for which we are providing services to you where, for example, we have a legitimate interest in retaining such information that is not outweighed by your fundamental rights and freedoms, or where we have statutory or regulatory obligations to retain personal information for a longer period, or where we may need to retain the information in the event of a legal claim.

TRP endeavors to ensure that Personal Data is retained for an appropriate period and no longer than necessary. Retention of data is detailed in our Data Retention Policy.

10. Transfers outside the European Economic Area

We may transfer, store, or process your personal information to countries outside the European Economic Area. Where the laws of such countries do not afford an equivalent level of protection of personal information as the laws of Ireland, we take specific steps in accordance with data protection law to protect your personal information.

We will use one of these safeguards:

- Transfer to a non-EEA country with privacy laws that give the same protection as the EEA.
- Put in place a contract (in a form that is approved by the European Commission) with the recipient of the personal information that means they must protect it to the same standards as the EEA.
- Transfers to organisations that are part of an EU Framework that sets privacy standards for data sent between countries. These frameworks make sure those standards are similar to what is used within the EEA.

11. How we use automated processing

We may analyse your personal information by automated means for the purposes of market research, analysing our customer database and for our marketing activities. You have the right to object to this at any time by emailing dco@ohm.ie.

12. Marketing communications

If you are a customer or prospective business contact, we may use your name, address, email address, postal address and/or telephone number for marketing communications. TRP will ensure that a legitimate interest assessment has been conducted to ensure there is an appropriate balance between our interests and your rights and freedoms.

Customers can opt-out of receiving direct marketing communications from TRP by following the unsubscribe link in the relevant marketing message.

TRP will not provide any personal information to third parties or partners for direct marketing purposes unless the users have consented to TRP giving their Personal Data to third parties or partners for that purpose.

If a user opts-out from receiving communications from third parties or partners, TRP will no longer share that user's contact details with our partners or third parties. However, users will still need to directly opt-out from communications from the partners to whom we have already given their information.

TRP uses third party service providers to help deliver its marketing communications. Those third-party data processors are subject to contractual and legal restrictions in relation to any unauthorised use of your information.

Online Advertising

By using TRP online services, we may use information gathered from you, and information gathered from third parties, to provide our users with certain tailored advertising offerings through our website and other services. TRP gathers web viewing Personal Data from users across its various sites, with their consent and which may then be used by TRP and its service providers to deliver advertising to particular groups of users based on the preferences or interests inferred from the data collected and processed by TRP (or a third-party service provider's) technology. For example, TRP will only use cookies, web beacons, social plugins, tracking pixels and similar technologies to collect information from a mobile or other device with the consent of the user.

13. Processing for Security Purposes

TRP has closed circuit television cameras ("CCTV") located throughout its premises covering buildings, internal spaces, car parks, roads, pathways, and grounds. TRP CCTV system is implemented in a proportionate manner as necessary to protect TRP property against theft or pilferage and for the security of employees, customers, and visitors to the TRP premises (to protect their vital interests). Whilst CCTV footage is monitored by TRP, senior management, security staff or contractors, access to recorded footage is strictly limited to authorised personnel. Footage is retained for 60 days, except where incidents or accidents have been identified in which case such footage is retained specifically in the context of an investigation of that issue. CCTV footage may be used in the context of disciplinary proceedings involving TRP employees and to detect, establish and/or defend legal proceedings (to protect the vital interests of TRP, staff and affected individuals). CCTV footage is not disclosed to third parties except where disclosure is required by law (such as for the purpose of preventing, detecting, or investigating alleged offences) and in such instance's disclosure is based on a valid request. Signage indicating that CCTV is in use is displayed throughout TRP premises. TRP uses vehicle tracking in all its vehicles, the purpose of installing and using telemetric tracking systems includes assisting the business in the efficient management of business assets and ensuring the security and safety of employees, the public, and the assets of our business.

14. If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a test drive or a courtesy car). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

15. Information Security

In accordance with applicable laws, TRP ensures that all Personal Data controlled by TRP is held securely using appropriate security measures including the following:

- Physical measures such as locked filing cabinets and offices containing Personal Data;
- IT security systems;
- Restricted access to Personal Data subject to approvals;
- Time limits on retention of personal data;
- Provision of targeted data protection training to employees, contractors and other staff who have access to and process Personal Data;
- Password restrictions on access to Personal Data; and Technical measures including:
 - a. Encryption on TRP laptops/portable devices; and
 - b. Logging mechanisms to record certain access to Personal Data and alteration and other processing of Personal Data.

In the event of a personal data breach, TRP will comply with applicable reporting and notification obligations under data protection law. TRP has in place a Breach Notification Policy.

16. Your Rights

In certain circumstances, you have the following rights under data protection law in relation to your personal data:

A right to access Personal Data held by TRP.

- (a) Any individual has a right to make an access request, in writing, under data protection law for a copy of their Personal Data held by TRP. TRP may ask for further identification details to confirm your identity before the relevant information is provided.
- (b) It should be noted that there may be specific exemptions relating to accessing Personal Data. If we utilise any of the exemptions, we will provide you with details and our justification for their use.

Other data protection rights

- (a) Rectification of inaccurate personal data;
- (b) Erasure of personal data (also known as the "right to be forgotten");
- (c) Restriction of processing of personal data;
- (d) Right to data portability;
- (e) Right to object to processing of personal data.

However, under data protection law, these rights are available only in certain circumstances. If you wish to exercise any of your data protection rights, please contact dco@ohm.ie. Please provide as much detail as possible to enable us to respond to your request and to locate relevant personal data about you

If you wish to exercise any of these rights, please contact us using the contact details below. We will endeavor to respond to your request within a month. If we are unable to deal with your request within a month, we may extend this period by a further period of two months and we will explain why.

By Post: DCO, OHM Group, Clonlara Rd, Baldonnell Business Park, Dublin, D22

By Email: dco@ohm.ie

By Phone: + 353 (0) 1 4034100

You also have the right to lodge a complaint to the Office of the Data Protection Commission. For further information please see www.dataprotection.ie

17. Updates

This policy ["version 2"] was updated and deemed effective on the 11th of January 2021.

We will update this data protection statement from time to time. Any updates will be made available on our website at <https://www.trpstore.ie/> and, we would ask that you check regularly.