

PRIVACY NOTICE FOR ALL CUSTOMERS

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our employees, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former customers & suppliers.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data on our customers in order to carry out effective and efficient processes. We keep this data in customers file relating to each customer and we also hold the data within our computer systems, for example, our rental booking system.

Specifically, we hold the following types of data, as appropriate to your status:

- a) Personal details such as name, address, phone numbers and email addresses
- b) Your photograph
- c) Your gender, marital status, information of any disability you have or other medical information
- d) National Insurance numbers
- e) Bank account details
- f) Debit and Credit card details
- g) driving licence
- h) Motoring convictions
- i) Criminal convictions
- j) CCTV footage

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during your hire enquiry and subsequently upon the start of your hire date.

In some cases, we will collect data about you from third parties, such as your employers when gathering references or credit reference agencies.

Personal data is kept in files or within the Company's IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the hire contract we have with you, including ensuring we are paid correctly.

The information below categorises the types of data processing, appropriate to your status, we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the hire contract that we have entered into with you e.g. using your name, contact details	Performance of the contract
Ensuring we are paid	Performance of the contract
Ensuring VAT is paid	Legal obligation
Carrying out checks in relation to your driver's licence	Legal obligation
Supplying your details on to the police, local authorities and parking company's upon request	Legal obligation
Making decisions about vans and area's	Our legitimate interests
Maintaining comprehensive up to date personnel records about your driver's licence	Legal obligation
Checks to make sure you are covered for Insurance	Legal obligation
Business planning and restructuring exercises	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests
Provide on request your details to third parties for services requested by you. Ie. Insurance, finance & Sales	Our legitimate interests

E) SPECIAL CATEGORIES OF DATA

We will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of hire with you. This could include being unable to offer you a vehicle

G) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate and where the law permits us. This data will usually be collected at the enquiry stage, however, may also be collected during your hire contract. We use criminal conviction data to determine your suitability, or your continued suitability for the hire. We rely on the lawful basis of DVLA to process this data.

H) WHO WE SHARE YOUR DATA WITH

Customers data is only shared within our accounts department, our rentals department & our maintenance department. We will obtain your signature for your acceptance for us to pass your data to a third party company. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons:

- a. Insurance Purposes

- b. Drivers Licence Enquiries
- c. Finance Options

We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

J) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your hire with us though in some cases we will keep your data for a period after your hire has ended. Some data retention periods are set by the law. Our retention periods are: Retention periods can vary depending on why we need your data.

K) CUSTOMERS RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in our separate policy on Subject Access Requests;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

L) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

M) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

N) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is:
Lee Osborne
01953 667988