Issue No: 6

Issue Date: 10/09/19



This Privacy Notice relates to the FleetCheck Ltd website accessible at www.fleetcheck.co.uk which is owned by and operated by FleetCheck Ltd, Eastcourt Farm, Malmesbury, Wilts SN16 9RZ. Company Registration No 05674824. FleetCheck Ltd is registered with The Information Commissioner's Office (ICO Registration No Z9426134).

FleetCheck Ltd respects your privacy and is committed to protecting it. FleetCheck also has obligations under the Data Protection Act 2018 and any subsequent replacement legislation ("the Act") regarding the collection, use and storage of personal information relating to individuals which FleetCheck receives via the website. FleetCheck provides this Privacy Notice to inform you of our policy and practices and of the choices you can make about the way your information is collected and used. FleetCheck ensures that any data about individuals received via the website will be processed in accordance with the principles of the Act and this notice.

By visiting www.fleetcheck.co.uk or my.fleetcheck.co.uk you are accepting and consenting to the practices described in this notice.

Information we collect

Information you give us

This is information that you give us by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, and when you report a problem with our site.

The information you give us as a FleetCheck client may include your name, address, e-mail address, fax number and phone number, user IDs and passwords. For this information FleetCheck are the data controller.

Additionally, you may provide multiple vehicle and driver related data, contact preferences and other similar information within the service, for this data FleetCheck are the data processor and you, the client, are the data controller.

We use your data to respond to your enquiries about our services (the lawful basis for this is "Legitimate Interest")

and to provide our services to you (the lawful basis for this is "Contract").

Information we collect about you

With regard to each of your visits to our site we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full
 Uniform Resource Locators (URL) clickstream to,
 through and from our site (including date and
 time); products you viewed or searched for; page
 response times, download errors, length of visits to
 certain pages, page interaction information (such
 as scrolling, clicks, and mouse-overs), and methods
 used to browse away from the page and any phone
 number used to call our customer service number.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

How we use your information

Information you give us

We will use this information:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about where you have given us permission to do so or where you have not indicated that you do not want us to use your data in this way;

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- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you where you have given us permission to do so. If you are an existing customer, we will only contact you by -e-mail with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this;
- To notify you about changes to our service;
- To ensure that content from our site is presented in the most effective manner for you and for your computer;
- FleetCheck processes your and your drivers'
 personal data in order to organise, administer and
 run an online software programme which is
 accessible via the website. More specifically,
 FleetCheck uses your information to communicate
 with you via e-mail and phone regarding your
 FleetCheck online account;
- FleetCheck may also use your personal data to gain a better understanding regarding who uses the FleetCheck website and how they use it, including the web pages they access so as to be able to improve the website;
- Occasionally, FleetCheck may use your information to contact you for market research regarding FleetCheck's products and services.

Information we collect about you

We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer;

- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our site safe and secure;
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

FleetCheck does not collect extra information about its visitors from other sources, such as public records or bodies, or private organisations. If FleetCheck wishes to use your personal data for a new purpose, other than for which it was originally supplied, FleetCheck will ask you first.

Disclosure of your information

We may share your personal information with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties supplying back office services;
- Selected third parties supplying licence checking or telematics services, if you have selected to use these services;
- We may on occasions suggest to you selected third party providers that may be of interest to you offering a service which enhances the FleetCheck software but we will not share your data with third party providers without your consent;
- We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third-party or as part of any business restructuring or reorganisation, in which event we will take steps to ensure that your privacy rights under this Privacy Notice continue to be protected;
- If we are under a duty to disclose or share your personal data in order to comply with any legal

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obligation, or in order to enforce or apply our terms of supply and other agreements; or to protect the rights, property, or safety of FleetCheck, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;

 We may also share your personal information to third parties for the purposes of the prevention or detection of crime or fraud.

Where we store your personal data

The information that we collect from and about you will be stored within systems located within the European Economic Area and therefore subject to equivalent data protection rules and safeguards. We will not store any of your information outside of the EEA.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This
 enables you to ask us to delete or remove personal
 information where there is no good reason for us
 continuing to process it. You also have the right to
 ask us to delete or remove your personal
 information where you have exercised your right to
 object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Our Data Protection Officer in writing at privacy@fleetcheck.co.uk or at the following address:

FleetCheck Ltd, Eastcourt Farm, Malmesbury, Wiltshire SN16 9RZ

Complaints and Disputes

FleetCheck is committed to working with you to obtain a fair and rapid resolution of any complaints or disputes relating to privacy matters. Please send us your questions and comments regarding our privacy practices to privacy@fleetcheck.co.uk.

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If you think our collection or use of personal data is unfair, misleading or inappropriate or if you have concerns about the security of your personal data, you also have the right to make a complaint to the Information Commissioner's Office at the following address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or via their website at https://ico.org.uk/

Links to Third Party Websites

Parts of the website may contain links to third party websites for your convenience and information. If you use these links, you will leave the website. When you access a third-party website, please understand that FleetCheck Ltd does not control the content and is not responsible for the privacy practices of that site. FleetCheck Ltd suggests that you carefully review the privacy policies of each website you visit. This Privacy Notice does not cover the information practices of those third-party websites linked to the website. These other websites may send their own cookies to users, collect data, or solicit personal information.

Security

To prevent unauthorized access, maintain accuracy, and ensure proper use of information, FleetCheck has employed physical, electronic, and managerial processes including username and password protection of your account to safeguard and secure the information FleetCheck collects online. FleetCheck does not give visitors to the website the option of other secure transmission methods to send FleetCheck their personal data, unless otherwise indicated. Accordingly, your attention is drawn to the fact that information carried over the Internet is not guaranteed as secure. Information could be intercepted, lost, redirected, changed and possibly read by third parties.

All FleetCheck's employees and data processors who have access to and are associated with the processing of personal data, are obliged to respect the confidentiality of such personal data.

Changes to this Privacy Notice

If changes to the FleetCheck Data Protection Policy (and hence this Privacy Notice) include any significantly different use of your personal data, we will let you know and give you the option to agree to the new use.