

## Privacy Policy

Your details will never be used for marketing or advertising without your permission.

### Getting Started

This privacy policy covers the personal information we collect, use and disclose using our products and services either online or offline.

We need to collect personal information from you to rent or provide other services. We collect personal information when you give it to us, such as by telephone, e-mail, mail, at the counter or our online booking system.

There may be circumstances where if you choose not to provide personal information, which is required by us, we will not be able to provide you with our products or services. For example, if you are renting a vehicle from us we would require as a minimum your full name, address, date of birth, telephone number, licence details, payment information and photograph.

There may be circumstances where after using our products or services we would be required to legally share your information with a third party upon written request:

- The police and other law enforcement agencies
- Ticket issuing authorities
- Our motor insurance supplier

Data protection law permits us to share your information on this basis.

We will collect technical information about your devices when you use our website where permitted.

### When You Rent a Vehicle

When you make a reservation or rent a vehicle we collect information from you to enable us to do this as set out in our general terms and conditions and rental agreement terms and conditions. We will also use this information to perform security or fraud checks, to enforce our legal rights and for our own research. The information we collect includes:

- Full name
- Date of birth (for licence verification, hire and legal requirements)
- Telephone number (to enable us to contact you in relation to your rental)
- E-mail address (if you are booking online or wish to receive promotional/marketing e-mails)
- Postal address (for validation, security and to forward any post rental documents in relation to your rental)
- Gender (for licence verification)
- Licence details for all drivers (licence verification, hire and legal requirements)
- Payment information
- Information related to any previous accidents or endorsements you have had within the last 5 years.

We will be required to see but will not copy or document:

- A form of identification which shows your name and postal address dated no more than 2 months prior to your rental date
- ID card in relation to any discounts or promotions offered

If an accident, theft or damage occurs during your rental we will collect information from you regarding the incident which may be on an insurance provided from. We will ask for full details of the incident, third parties involved, witnesses and any injuries that may have been sustained. This information will be combined with information previously collected from you. This information will be shared with third parties which legally require it, such as:

- Our motor insurance company
- The police or other law enforcement agencies

During your rental we will collect where and when you collected and returned your vehicle, mileage, accident history and other information related to the vehicle and your use of it. This information is required to monitor our fleet usage. Some vehicles will automatically collect information during your rental which we do not document such as fuel consumption.

Some of our vehicles may have a gps tracker fitted, however we are unable to share information as to which vehicles may have this device. We will only use the information collected by this device for security if we are given reason to do so.

We will collect information about any speeding, parking, toll or any other traffic related fines or offences committed during your rental which are provided to us by law enforcement agencies or issuing authorities. We will use this information to enable us to deal with related paperwork in accordance with our rental agreement terms and conditions.

When you call us (from any telephone), we may record the call for training and monitoring purposes.

### **Photo and Video**

CCTV is used at our location for security and is indicated by signage.

Your photograph may be taken at the time of hire for security and validation.

### **Online**

When you visit and use our website we automatically collect technical information from you.

Your IP address may be collected to enable us to diagnose problems, administration and to audit our website. We do not normally link IP addresses to anything identifiable, however we may use an IP address to prevent a user accessing our website in the interest of protecting our service and site. In rare instances an IP address may be passed to a law enforcement in the interest of identification.

We may also collect your browser type, internet service provider, referring and exit pages, files and pages viewed, date/time stamps and operating system for the interest of our own market research. We use third party applications to collect this data such as Google Analytics and Clicky.

On some pages we may set and access Persistent Cookies on your computer. These will stay on your hard drive until you delete them. We use cookies to aid your experience and help you access information quickly. Your browser is automatically set to accept cookies by default. You have the option to change these settings in your browser. Cookies do not corrupt or damage your computer, programs, or computer files. Some pages may also use Session Cookies. These are temporary cookie files, which are erased when you close your browser

## Marketing and Advertising

For advertising or marketing, we may wish to contact you using email, post, phone or SMS.

This is on an 'opt-in' basis where your consent for each form of contact is treated separate. Please note, we may not use all forms of contact mentioned above.

You will be asked when you collect your vehicle if you would like to 'opt-in' for each form of contact we are using. We will never use your information for this purpose without your prior consent.

You can 'opt-out' at any time by written or verbal request.

This does not affect our right to contact you in relation to your booking or rental before, during or after for non-marketing/advertising purposes.

## In Car Systems and GPS System

Some of our vehicles will offer you the option of linking your personal devices to the in-car system. Information this collects will be highlighted in the vehicle manual.

Some rentals are supplied with GPS where addresses are collected via the input of the hirer.

It is your responsibility to ensure any data collected by in car systems and/or GPS devices is removed before you return. We will not take any responsibility for information left in these devices post rental which may later be passed on to future hirers.

## Sharing Your Information

We may share your personal information with the following third-party organisations:

Third Party	Purpose	Legal Basis for Processing
Prohire Rental Software	To securely record and use the information you provide to us  To process your reservation and rental  To record rental data	Legitimate interest and consent
PDQ Issuer to obtain payment from you	To process payments and refund	Performance of contract
Law enforcement and government agencies	To verify your driving licence  As requested and permitted by law  To act regarding illegal activity and traffic violations  If we have a good faith belief that there is a situation which may pose a threat to the safety of you or somebody else  If we are permitted by law	Legal requirement

Insurance companies	Manage any claim(s) which is related to your rental	Legal requirement
Hireguard and Prohire Risk	To notify other rental companies if the hirer has committed illegal offences with the hire vehicle, abused staff, miss used the hire vehicle, looked to defraud, is a bad debtor or any other reasonable reason to notify other rental companies of the hirer. It is to the discretion of the receiving hire companies how they use this information.	Consent via rental agreement

## Security

We take reasonable steps to make sure your information is protected from unauthorised use, access, disclosure, alteration, destruction or loss. Hard copies of your information, such as booking forms and rental agreements, is security kept on location. Your information which is held digitally is held on our software provider Prohire. This information is kept on a database which is stored in a locked rackspace in a shared data centre which is only accessible to the technical director and certain members of the technical support team. The rackspace provider has access to the data centre but no access to the database. Technical security includes a dual firewall system (live and standby), password protection on the server, up to date Microsoft antivirus software updated daily and security patches. The live real-time database is secured by way of a replicated mirrored backup server onsite. Certain elements of the database are encrypted (the client record) and Prohire aims to fully encrypt this system. Physical access to the systems is limited by way of designated keycard access by the technology team only, separate from Prohire employee keycards. Only members of our office staff have access to this information using a password system where all access and alterations are recorded.

Information you supply to us via our website is done so on a secure webpage with a valid SSL security certificate provided by comodo.

Whilst we take security seriously, no system is 100% secure. We can not completely guarantee the protection of your personal information any more than any other organisation can.

We do not ask for your payment information, such as debit/credit card number, via e-mail, text or any other document we send you. Please only provide your payment information via our own website, at our counter or over the phone once you are sure you are dealing directly with us.

## Data Retention

Your information is kept for no longer than is reasonably necessary or legally required by law. If you have only supplied your information as an enquiry, your data will be redacted after one month (for retrieving quotes). Your information will otherwise be redacted physically 5 years and digitally 7 years after your last rental end date.

If there is an ongoing legal claim which exceeds these periods, your information will be redacted when we can legally do so.

## **Your Rights**

In accordance to date protection laws, you may have the following rights when it comes to handling your personal information:

- Right of access: You may have the right to request a copy of the information we hold about you and to request supporting information explaining why this information is held.
- Right of rectification: You may have the right to request we rectify any inaccurate information held about you. Please be aware some information we may require supporting documentation to make this change.
- Right to erasure: You may have the right to request we erase personal information held about you.
- Right to restrict processing: If you believe the information we hold about you is inaccurate, you may have the right to request we do not use this information. Please note, we may require the correct information to be provided.
- Right to data portability: You may have the right to request the information we hold about you is sent to you in .csv format.
- Right to withdraw consent: We will only process or use your personal information with your consent and you have the right to withdraw this consent at anytime either verbally or in writing. This will not affect the lawfulness of us processing your information and we may continue to use your personal information if permitted and/or required by law.
- Right to object: Where we process your personal information based on a legitimate interest (or those of a third party) you have the right to object this. However, we may still be legally required to process your personal information.