

# CLM Fleet Management Privacy Policy

## 1. General intro

1.1. We are committed to ensuring that we manage your personal data professionally and in compliance with all applicable data protection laws. Part of this commitment is to ensure that there is transparency about how we process personal data. This policy includes an explanation of:

- 1.1.1. what data we are processing;
- 1.1.2. why we are processing it and what we do with it;
- 1.1.3. whether we will share it with anyone else;
- 1.1.4. whether we will transfer it outside of the United Kingdom;
- 1.1.5. how we keep your data safe; and
- 1.1.6. your rights.

1.2. We hope that you find this Privacy Policy helpful. If you have any questions, please don't hesitate to contact us.

## 2. About us

2.1. Our company name is CLM Fleet Management PLC and we are located at Newport Pagnell. In this policy we have referred to the CLM Fleet Management as: we, us, our or the CLM.

2.2. For any queries concerning your data please contact the GDPR Team on at the above address or by email at [GDPR@clm.co.uk](mailto:GDPR@clm.co.uk).

2.3. We are a fleet management business.

## 3. Your personal data

3.1. We process your personal data if we understand that you may be interested in purchasing our products or services. In this section 3 we provide more detailed information about how we will manage your personal data, whether this be via our websites or our mobile applications (for example our Smart Exchange App).

### 3.2. What data do we hold about you and how have we obtained this?

- 3.2.1. We will obtain information about you when you register an account in the app or on our websites and / or enquire about our products or services. Typically, the information that we obtain will be data such as; name, email address telephone number as well as driving license information and telematics data where relevant.
- 3.2.2. If you have visited or used our website or apps we may automatically collect some personal information including: details of your browser and operating system, mobile device, the website from which you visit our website, the pages that you visit on our website or app, the date of your visit, and the Internet protocol (IP) address assigned to you by your internet service. We collect some of this information using cookies – please see Cookies in section 5 for further information. We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.
- 3.2.3. Our telephone calls are recorded for training purposes and may also be used to verify any comments that were made during any conversation.
- 3.2.4. If you use our web chat or messaging function, we will keep a record of our communications.
- 3.2.5. Sometimes you will have sent your information directly to us, but you may have provided your information to your employer who, in turn, has provided the information to us.
- 3.2.6. We may also use your details to send you push notifications via our apps to your mobile device to inform you of events, reminders or information relating to your contract, for example service and MOT reminders. These notifications can be switched off in your mobile device settings.

### 3.3. How do we use your personal data and what is the applicable lawful basis?

- 3.3.1. Where you are an individual, sole trader or unlimited partnership and have **consented**, we:
  - 3.3.1.1. may provide you with marketing information about our products and services or the products and services of our selected partners or for events;
  - 3.3.1.2. we will use your interaction with our websites and apps and with any chat / messaging functions to identify which products will be the most relevant to you and deliver targeted and relevant messages to you.
- 3.3.2. Where we are required to do so to perform **our contract** with you, we may process your information for reasons such as managing bookings for the repair and maintenance of vehicles.
- 3.3.3. We may process your information to comply with **legal obligations** including assisting HMRC, the Police and the Driver and Vehicle Licensing Agency
- 3.3.4. We may process your information to allow us to pursue our **legitimate interests** including for:
  - 3.3.4.1. analysing our performance to further improve our customer services;
  - 3.3.4.2. market research, training and to administer our apps and websites;

- 3.3.4.3. the prevention of fraud or other criminal acts;
- 3.3.4.4. undertaking credit checks for finance;
- 3.3.4.5. complying with requests from you including if you exercise any of your rights noted in this Privacy Policy;
- 3.3.4.6. the purpose of corporate restructure or reorganisation or sale of our business or assets;
- 3.3.4.7. enforcing our legal rights or to defend legal proceedings and for general administration purposes.
- 3.3.4.8. (where you have contacted us on behalf of a business or organisation excluding sole traders or unlimited partnerships) providing you with marketing information about our products and services or the products and services of our selected partners or for events.
- 3.3.4.9. managing the repair and maintenance of any vehicle or any other activity connected with the use of the vehicle which you are using and which we manage under a contract with a third party connected to you (e.g. your employer).

#### **3.4. Will we share your personal data with any third parties?**

- 3.4.1. We may share your data with our third-party partners and other companies within our group, these companies include: Anglo Scottish Asset Finance Limited, Maxxia Limited, Maxxia Finance Limited, Maxxia (UK) Limited and other leasing providers.
- 3.4.2. We may disclose your information to our third-party service providers for the purposes of providing services to us or directly to you on our behalf e.g. advertising agencies or administrative service providers. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.
- 3.4.3. If we sell all or part of our business to a third-party, we may transfer your information to that party to ensure that it can continue to provide information that you have requested or for any of the other purposes that we have noted above.
- 3.4.4. We may transfer your data to government or other official bodies for the purposes of complying with legal obligations, for enforcing our rights, or for the prevention or detection of a crime.

#### **3.5. How long do we keep your data?**

- 3.5.1.1. If you have expressed an interest in buying products from us or from our selected partners, we will retain your contact details and related information concerning your enquiry for 2 years from the date that we last had contact with you.
- 3.5.1.2. If you have purchased products from us or from our selected partners, we will keep the data relating to that purchase (e.g. order forms and invoices and related correspondence) for 7 years from the termination of the contract or the most recent financial transaction.
- 3.5.1.3. Records of any discussions through our web chat facility will be kept for 3 months
- 3.5.1.4. If you have requested that we do not send you marketing information we will always retain sufficient information to ensure that we remember to comply with your request.
- 3.5.1.5. The periods stated in this section 3.5 may be extended if we are required by law to keep your data for a longer period.

#### **4. Transferring your data outside of the United Kingdom ('UK')**

- 4.1.1. The information that you send to us may be transferred to countries outside the UK. By way of example, this may happen where any of our group companies are incorporated in a country outside of the UK or if any of our servers or those of our third-party service providers are from time to time located in a country outside of the UK. These countries may not have similar data protection laws to the UK.
- 4.1.2. If we transfer your information outside of the UK in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected. These measures include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us if you would like more information about the protections that we put in place.
- 4.1.3. If you use our services whilst you are outside the UK, your information may be transferred outside the UK to provide you with those services.

#### **5. Cookies**

- 5.1. We use Cookies on our apps and websites. A cookie is a small text file which is placed onto your mobile device, computer or other electronic device when you visit our website or use our apps. This enables us to monitor how many times you use the apps and websites, which pages you go to, traffic data, location data and the originating domain name of your internet service provider.
- 5.2. You can find out more about the Cookies we use in our [Cookies Policy](#) available on the home page of our website.
- 5.3. You can set your mobile device / browser not to accept cookies, however some of our websites and app features may not function as a result.

5.4. For more information about cookies generally and how to disable them you can visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 6. Data security

6.1. We have adopted appropriate technical and organisational measures to protect the personal data we collect and use having regard to the state of the art, the nature of the data stored and the risks to which the data is exposed to human action or the physical or natural environment. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database.

6.2. 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 apps and websites; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access

6.3. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our apps and websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## 7. Links to other websites

7.1. Our apps and websites may contain links to and from other websites (e.g. social media sites such as Twitter, Flickr, YouTube and Facebook). Unless we own such websites, we accept no responsibility for the way in which they process your personal data. You are recommended to check the privacy policy of each website before you submit any personal data to it.

## 8. Your rights

### 8.1. Your right to access data

8.1.1. We always aim to be as open as we can and allow people access to their personal information. Where we hold your personal data, you can make a 'subject access request' to us and we will provide you with:

8.1.1.1. a description of it;

8.1.1.2. an explanation of why we are holding it;

8.1.1.3. information about who it could be disclosed to; and

8.1.1.4. a copy of the information in an intelligible form – unless an exception to the disclosure requirements is applicable.

8.1.2. If you would like to make a 'subject access request' please make it in writing to our contact email address noted in section 2.2 and mark it clearly as 'Subject Access Request'.

8.1.3. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. 8.1.4. Unless you agree a different time, we will complete your subject access request within one month.

### 8.2. Right to stop marketing messages

8.2.1. You always have the right to stop marketing messages. We will usually include an unsubscribe button in any marketing emails. If you do wish to unsubscribe, please just click the unsubscribe button and we will promptly action that request. Alternatively, you can update your marketing preferences by contacting us at any-time. Our contact details are shown in section 2.

### 8.3. Right to be forgotten

8.3.1. If we hold personal data about you, but it is no longer necessary for the purposes that it was collected and cannot otherwise be justified – you have the right to request that we delete the data.

### 8.4. Right to restrict data

8.4.1. If we hold personal data about you and you believe it is inaccurate you have the right to request us to restrict the data until it is verified. You also have the right to request that the data is restricted where you have a right to it being deleted but would prefer that it is restricted.

### 8.5. Transferring your personal data

8.5.1. Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under section 4 How we use your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file.

8.5.2. You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information

## **8.6. Right to complain**

8.6.1. You always have the right to complain to the personal data regulator, the [ICO](#). You may also be entitled to seek compensation if there has been a breach of data protection laws.

## **9. Policy updates**

**9.1.** This policy was last reviewed and updated on 30<sup>th</sup> November 2021