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 Ltd 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 at the above address or by email at GDPR@clm.co.uk or call us on 01908 210100.

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.

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. 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 including 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. 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.

3.5.2. 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 10 years from the termination of the contract or the most recent financial transaction.

3.5.3. Records of any discussions through our web chat facility will be kept for 3 months.

3.5.4. 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.

3.5.5. 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. The information that you send to us may be transferred to countries outside the UK. By way of example, this may happen 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.

4.2. 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.

4.3. 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.

6. Data Security

6.1. We have implemented an ISO 27001-certified Information Security Management System (ISMS) to ensure the effective deployment of technical and organizational measures for the protection of customer personal data. Additionally, we conduct regular internal and external independent audits to continuously improve our ISMS, aiming to minimize risks to personal data and maintain the highest standards of security.

6.2. These technical and organisational measures are in place 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.

6.3. All CLM staff and contractors are required to complete annual information and cyber security training to ensure they are fully aware of their responsibilities in protecting personal data.

6.4. 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

6.5. 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 LinkedIn, X, 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. Right to be informed

8.1.1. You have the right to clear and transparent information about how we collect and use your personal data. This Privacy Policy is part of fulfilling that obligation. If you need further clarification, please contact us using the details in section 2.2.

8.2. Right of access

8.2.1. You can request access to the personal data we hold about you. This is called a 'subject access request'. We will provide:

- A description of the data we hold
- Why we are processing it

- Who it may be disclosed to
- A copy of the data in an intelligible form (unless an exemption applies)

8.2.2. If you would like to make a 'subject access request' please make it either in writing to our contact email address details noted in section 2.2 and mark it clearly as 'Subject Access Request'. Or you can verbally contact us on the phone number in section 2.2.

8.2.3. We aim to respond within one month.

8.3. Right to rectification

8.3.1. Also known as the 'right to be forgotten'. You can request deletion of your personal data where:

- It is no longer necessary for the purposes collected
- You withdraw consent and there is no other legal basis
- You object to processing and there are no overriding legitimate grounds
- The data has been unlawfully processed

8.4. Right to restrict processing

8.4.1. You can ask us to restrict processing of your data in certain circumstances, for example:

- If you contest its accuracy
- If processing is unlawful but you prefer restriction over deletion
- If we no longer need the data but you require it for legal claims

8.5. Right to data portability

8.5.1. Where processing is based on consent or contract and carried out by automated means, you can request a copy of your data in a structured, commonly used, machine-readable format (e.g., CSV). You may also ask us to transfer it directly to another service provider where technically feasible.

8.6. Right to object

8.6.1. You can object to processing of your personal data where we rely on legitimate interests or for direct marketing purposes. If you object to marketing, we will stop immediately.

8.7. Rights related to automated decision-making including profiling

8.7.1. You have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal or similarly significant effects. If such processing occurs, we will ensure appropriate safeguards are in place or obtain your explicit consent.

8.8. Right to complain

8.8.1. 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.

The Business Management System Manager is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the Business Management System.

A current version of this document is available to all members of staff on the company network and is published.

This procedure was approved by the ExCo and is issued on a version-controlled basis.

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Updated to now include version releases Reviewed for ISO27001:2022 Transition	ExCo	17/06/2025
2	Changes retention period to be inline with Santander	ExCo	05/08/2025
3	Amend rights section to come inline with sections in GDPR	ExCo	20/11/2025