

TJS Hire Company (Humberside) Limited whose registered office is 7 Hebden Road, Scunthorpe, DN15 8DT (UK company registration number 1364047) take data privacy seriously and will only use your information in accordance with the policy below. This means we will adhere to the relevant legislations whilst doing our best to provide you with the best level of service and security.

This policy sets out how and why we store, process and delete your data and gives you information on how to contact us to view, correct or delete that data.

Last revised: December 2018

## INTRODUCTION

In this Privacy Policy “we, us or our” means TJS Hire Company (Humberside) Limited that collects or processes your personal information (as defined below) and interacts with you (for example, the entity from whom you hire a vehicle).

In this Privacy Policy, references to “you” means the individual whose personal information (as defined below) we collect, use and process, whether this information is collected on the Site (as defined below), in person, by telephone or otherwise and will apply whether you provide us with the personal data yourself or it is provided by a third party.

In this Privacy Policy, references to the "Site" means the website [www.tjs-selfdrive.co.uk](http://www.tjs-selfdrive.co.uk)

We take our obligations under privacy and data protection law very seriously. This policy sets out how we will use and process the personal information that you, or third parties, provide to us or we collect from you.

This Privacy Policy may change from time to time and therefore you should review it regularly. This policy was last updated in December 2018.

For the purposes of the Data Protection Act 1998 and any successor legislation including the General Data Protection Regulation (GDPR) (EU 2016/679) (“Data Protection Legislation”) we are the data controller in respect of the personal information that we collect and process in accordance with this Privacy Policy. You can contact us by email at [dataprotection@tjsselfdrive.co.uk](mailto:dataprotection@tjsselfdrive.co.uk). Our Data Protection Officer can be contacted in writing at TJS Self Drive, 7 Hebden Road, Scunthorpe, DN15 8DT

## Lawfulness of our Processing

It’s lawful for us to process personal information about you in different circumstances, as follows:

- 1) we process personal information about you in order to fulfil any order you place with us or otherwise to perform our contract with you;
- 2) for any purpose that you have consented to, where we have asked for your consent in the box that pops up when you first visit our Site and/or as part of the ordering process;
- 3) where we are required to do so to comply with our legal obligations; and

4) we have a legitimate interest in processing your personal information. We have a legitimate interest where we may wish to contact you about products or services, market to you, or collaborate with others to improve our services.

#### WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW IS IT USED

The personal information we collect and hold about you includes:

- name, address, telephone number (including mobile phone) and email;
- the information included in any documents you send to us (such as your driving licence and passport), or when using our Site (including via your customer portal, if you use one), including to search for hire vehicles, place orders or report problems with the Site or an order;
- information you complete in relation to customer satisfaction surveys;
- your occupation or the nature of your business (if applicable);
- details about the vehicle to be hired.
- information obtained by credit reference agencies (further information is set out below);
- information provided to us by third parties with whom we are working (such as business partners and brokers, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers). We will notify you when we receive information about you from them and the purposes for which we intend to use that information, if different from the purposes set out in this Privacy Policy;
- details about your marketing preferences and interests;
- debit or credit card details or the bank account details from which direct debits under your vehicle hire will be collected;
- information which we collect about you when you visit our Site:
  - 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; and
  - 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), methods used to browse away from the page and any phone number used to call our customer service number;

In this Privacy Policy we refer to the information set out above as "personal information".

We may use any personal information provided by you or collected by us in connection with the relevant vehicle hire agreement, or otherwise as a result of our dealings with you, including for the purposes of:

- allowing you to register to use our Site, fulfilling our contractual obligations to you (or enforcing our contract terms against you) and providing you with the services you require;
- to respond to any requests for advice or information and otherwise provide customer support to you;
- assessing and evaluating the quality of the vehicle hire or other services we have supplied complying with legal and regulatory obligations and best practice standards (including carrying out credit reference checks and taking steps to comply with our obligations under anti money laundering regulations);
- fulfilling the requirements of our insurance policies (including the requirements of our insurance providers);
- to send you information relevant to our Site, such as informing you about changes to this Privacy Policy or maintenance to our Site;
- as part of our efforts to keep our site safe and secure;
- in case we have any queries concerning any aspect of your use of our Site;
- to ensure that content from our Site is presented in the most effective manner for your device;
- to allow you to participate in interactive features of our Site when you choose to do so;
- to administer our Site and for internal operations, including troubleshooting, data analysis, testing and research; and
- to measure or understand the effectiveness of advertising we serve to you and others.

You have the right to ask us to restrict processing of your personal data and a right to object to our processing of your personal data in this way. If you exercise either of these rights you may not be able to make full use of our Site and/or we may not be able to provide you with information that you have requested us to provide to you.

We will take a scan or copy of your driving licence if you are the person hiring a vehicle from us (either in your own right or on behalf of an organisation) when the vehicle hire commences. We will also need a copy of the driving licence of all other named drivers. We retain a copy of the driving licence for some of the purposes set out above.

We may also use your personal information to contact you by e-mail, telephone, post, SMS and other electronic means (including social media), with information about services (including improvements we have made to our services), industry news, industry relevant legislation changes, promotions and offers that may be of interest to you. We may use your personal information in order to establish the services, promotions and offers that are likely to be of interest to you. We will do this marketing in accordance with any preferences you have indicated to us.

Please see above on how to contact us as to how to change your marketing preferences. You can also choose to stop receiving marketing e-mails or SMS messages from us by e mailing the data controller. Any changes you make to your communication preferences will be processed by us within two working days of our receipt of your instruction; however, you may still receive non-essential communications in the intervening time between the submission of your change and when we process that change.

## WHERE WILL YOUR PERSONAL INFORMATION BE PROCESSED?

We have in place appropriate technical and security measures to prevent unauthorised or unlawful access to or use of, or accidental loss of or destruction or damage to your information. You are responsible for protecting against unauthorised access to your internet device and to your computer and we ask you not to share a password with anyone. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data including by taking the security measures we are required to by Data Protection Legislation, we cannot guarantee the security of your data transmitted to our Site. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and in accordance with the appropriate safeguards as required by relevant data protection law, including:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; and
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

## SHARING WITH THIRD PARTIES

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may pass personal information to people who process data for us. We have contracts with these people and we ensure they are contractually bound to do only what we say they can do with your information. We may pass details about you to our agents and subcontractors to help us with any of our uses of your data set out in this Privacy Policy; for example, we may use third parties to assist us with providing the administration for running our Site, to analyse data and to provide us with marketing or customer service assistance.

We may also share your personal information with:-

- law enforcement agencies, regulatory bodies and other third parties (including but not limited to the Driver and Vehicle Licensing Agency) if: we are under a duty to disclose or share your personal information in order to comply with any legal obligation

(including but not limited to in connection with a court order); in order to enforce our website terms of use or our terms and conditions of hiring vehicles, or any other agreement we have with you; or to protect the rights, property or safety of us, our customers or others;

- our insurers to comply with our insurance obligations;
- professional advisors and debt collection agencies to assist with the recovery of amounts owed to us by you or the organisation you represent under any agreement between you and us;
- credit reference agencies (for companies/individuals wanting to obtain a credit account)

#### Further information about personal data.

- Credit reference agencies, government authorities, private parking companies, B.V.R.L.A.

You agree that if you are untruthful or otherwise break the terms of your Rental Agreement we can pass your personal information to credit-reference agencies, debt collectors, Police, local authorities, councils, private parking companies or any other relevant organisation. We can also give this information to the British Vehicle Rental and Leasing Association (B.V.R.L.A.), which can share your personal information with its members to prevent crime and protect their assets, as allowed under the Data Protection Act.

If we receive a notification from the Police, local authority or private parking company that a penalty, parking charge notice or any other offence has been committed whilst the Vehicle was in your custody and control we will, where possible, provide your details to the authority/company issuing the penalty, notice or offence.

- Vehicle manufacturers, telematics providers

The hire vehicle is fitted with a telemetry and/or tachograph device which we may use to track its location, to verify its mileage is within agreed terms, and to score driver behaviour. If the Vehicle is not returned to the agreed time and place, we will use the data from the device to recover the Vehicle. Tampering with the device may render the hire vehicle inoperable.

Responsibility for protecting data held in a digital tachograph (where fitted) is the hirer's sole responsibility and we cannot be held liable in any manner whatsoever, if the hirer has not taken the necessary steps to protect the data by locking it in.

The hire vehicle is a connected vehicle and if you connect your personal phone to the hire vehicle it could result in the transfer of your personal data to the Vehicle and the Vehicle manufacturer's cloud servers. It will be the hirer's sole responsibility to erase any personal information that is stored in the Vehicle before returning it, and we can assist with this (at the hirer's request). If the hirer does not erase this information TJS Hire Company (Humberside) Limited are not deemed responsible to remove it.

#### Third party websites

Our site may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and look at the privacy policy applicable to the website in question.

Communication, engagement and actions taken through external social media platforms on which we may participate on are subject to the terms, conditions and privacy policies held with each social media platform respectively. We will never ask for personal information through social media platforms and we encourage users wishing to discuss sensitive details to contact us through primary communication channels such as by telephone or email. Our site may use social sharing buttons which help share web content directly from web pages to the social media platform in question. You are advised before using such social sharing buttons that you do so at your own discretion and note that the social media platform may track and/or save your request to share a web page through your social media platform account.

#### RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in respect of your personal information:

- a) a right to request from us access to your personal data;
- b) a right to request rectification of your personal data;
- c) a right to request erasure of your personal data;
- d) a right to ask us to restrict processing of your personal data and a right to object to our processing of your personal data (but if you do either of these, it may impact on your use of our Site and/or we may not be able to provide you with information that you have requested us to provide to you);
- e) a right to ask us for a copy of any personal data you have provided about yourself and to have a copy of it transferred from us to another data controller, in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. You can ask us to transfer this personal data directly to another controller, where technically feasible; and
- f) a right to lodge a complaint about how we treat your personal data with the Information Commissioner's Office.

If you want to exercise any of the above rights you should contact our Data Protection Officer using the contact details in the Introduction section above.

#### HOW LONG WE KEEP PERSONAL INFORMATION

If you agree to be added to our mailing list, we will keep your personal information for that purpose unless and until you tell us that you want to unsubscribe or be removed from the list. If you advise that you do not want to be added to our mailing list or you ask to be removed, we will delete your personal data (aside from keeping a record that you have asked us not to send you marketing information).

Other personal information will be stored only for so long as we continue to need it or are legally obliged which will vary depending on the nature of the information and the purposes for which we are processing it. Any information we hold will be protected by the terms of this Privacy Policy and, once no longer required and we have no further legitimate reason to retain it, it will be securely destroyed.

## COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our site in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our site.

## CONSENT

Where you have given us consent to use your personal information in any way, you have a right to withdraw that consent at any time. If you withdraw your consent, this does not affect the lawfulness of our processing activities carried out prior to such withdrawal. If you would like to withdraw your consent either follow the unsubscribe links in emails we send you or contact our Data Protection Officer using the contact details in the Introduction section above.

By visiting our Site and/or submitting data to us, and having ticked the opt-in boxes in the pop-up privacy notice asking for consent, you consent to our use of your data in the manner described in that privacy notice (as explained further in this Privacy Policy, as amended from time to time). You also consent to the placement by us of cookies on your access device, the cookies being used for the purposes set out in this Privacy Policy and which may contain personal information about you.

## CREDIT REFERENCE CHECK POLICY

This policy applies if you are hiring a vehicle under an established account or an account is being set up in order to permit you to hire vehicles and in each case if you are not paying in advance for the vehicle hire. In this section "Customer" means the business hiring a vehicle from us or you, if you are hiring the vehicle for yourself.

How we will use your information?

We will search credit reference agencies for information on Customers which may include carrying out a search on you personally. In so doing we will provide current and previous names, addresses and dates of birth, of all relevant parties, so if you are providing information about third parties, you must be sure that you have the agreement of those third parties. If false or inaccurate information is given and we identify fraud, details may be passed to credit reference and fraud prevention agencies.

We will use the information provided to us by credit reference agencies to help make decisions about whether to open an account, to verify identity, for the prevention and detection of fraud and/or money laundering, and to manage accounts (including for debt recovery and cash collection purposes). We may use scoring methods to do this.

When credit reference agencies receive a search from us they will place a search “footprint” on the credit file of the Customer whether or not we decide to open an account. This “footprint” may be seen by other organisations when the Customer applies for credit in the future and may affect the Customer’s ability to obtain credit elsewhere in the near future.

Credit reference agencies will supply us with public information such as County Court Judgements (CCJs) and bankruptcies, electoral register information and fraud prevention information on applicants’ (and their known financial associates), current and previous names, addresses and dates of birth.

How data will be used by credit reference agencies?

The information which we and other organisations provide to the credit reference agencies about the Customer, or any person financially linked to the Customer, may be supplied by credit reference agencies to other organisations and used by them to:

- prevent crime, fraud and money laundering, for example by checking details provided on applications for credit and credit related or other facilities;
- check the operation of credit and credit-related accounts;
- verify the identity of the Customer, or any person financially linked to the Customer when applying for other facilities;
- make decisions on credit and credit related services about the Customer, or any person financially linked to the Customer;
- manage the account or credit facility of the Customer, or any person financially linked to the Customer;
- trace whereabouts and recover debts that the Customer owes; and
- undertake statistical analysis and system testing.

Credit reference agencies can also be fraud prevention agencies.

How to find out more

To find out more about credit reference agencies please contact the 2 credit reference agencies currently operating in the UK; the information they hold may not be the same so it is worth contacting them all. They will charge a small statutory fee. These organisations are:

CREDITSAFE, Bryn House, Caerphilly Business Park, Van Road, Caerphilly CF83 3GR.

EXPERIAN, Consumer Help Service, PO Box 8000 Nottingham NG80 7WF

## QUERIES

If you have any queries about the way we handle personal information please contact our Data Protection Officer using the contact details in the Introduction section above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.