

S.H.B. HIRE LIMITED – CUSTOMER/SUPPLIER PRIVACY POLICY / PRIVACY NOTICE

The logo consists of the letters "SHB" in a bold, yellow, sans-serif font, enclosed within a black rectangular border with a thin yellow double-line border.

INTRODUCTION AND DEFINITIONS

S.H.B. Hire Limited (trading as SHB Hire) ("we", "our" and "us") is committed to protecting and respecting your privacy.

Our website may, from time to time, contain links to and from partners', advertisers', affiliates' and social media sites. If you follow a link to any of these websites, please note that these sites have their own terms of use and privacy policies. We do not accept any responsibility or liability for those terms or policies. Please check those sites' privacy policies before you submit any personal data to them as they may not be on the same terms as ours.

If you have questions about correcting or deleting your personal data please refer to sections 3 and 8 below.

References in this policy to "**data protection law**" mean (as applicable) the Data Protection Act 1998, the General Data Protection Regulation (Regulation (EU) 2016/679) and all related data protection legislation having effect in the United Kingdom from time to time.

References in this policy to "**data** or "**information**" include "**sensitive personal data**" and "**special categories of data**" (as defined under data protection law) where applicable.

1. OUR DETAILS

The data controller with conduct of your personal information is S.H.B Hire Limited of Enterprise House, Vicarage Road, Egham, TW20 9FB

2. HOW WE USE YOUR INFORMATION

2.1. The following sections explain what information we hold about you, why we are processing that information, the legal basis for the processing, the duration for which we keep your information and (if applicable) who your information will be shared with and where those recipients are based.

Which information do we process and for what purpose?

2.2. We process the following information about you for the following purposes:

2.2.1. **Information you give us.** This is information about you that you give us by filling in forms on our website, using our live chat feature, speaking to us over the phone or in person or by contacting us by email or post. This will usually be where you are a customer or potential customer of ours, you are supplier/contractor or potential supplier/contractor of ours, or you are employed by or otherwise represent one of the same.

The information you give us may include your name, address, email address, phone number and job title.

If you are a customer or prospective customer of ours (including an employee or representative of the same) and you provide us with a copy of your driving licence then we will also receive your photograph, your date and place of birth and your home address. If you provide us with a copy of your passport then we will also receive your photograph, your date and place of birth, your nationality and confirmation of your sex. If you provide us with a utility bill then we will also receive your home address. These additional categories of personal information reflect the information set out on those forms of identification.

We also receive bank details from customers. If you are a sole trader or partner in a partnership then those bank details may contain personal information about you.

2.2.2. We process information you give to us for the following purposes:

- 2.2.2.1. where you are a potential customer, to carry out a credit check against the information you have provided in order to determine your eligibility to receive our services;
- 2.2.2.2. where you are a customer or potential customer, to supply you with the hire services you have purchased from us and/or to take pre-contractual steps to provide you with a fee quote or other requested information in relation to our services;
- 2.2.2.3. where you are a customer, to manage your account with us;
- 2.2.2.4. where you are a supplier or contractor of ours, to obtain goods and services from you and otherwise manage our account with you, including taking pre-contractual steps such as requesting price quotes or other information;
- 2.2.2.5. to send you updates about our service offerings from time to time; and
- 2.2.2.6. to otherwise respond to your enquiry.

2.2.3. **Information we collect about you.** Through our website we collect non-personally identifying information of the sort that web browsers and servers typically make available. This includes technical information, such as your IP address and your login information and information about your visit, such as records of how you navigate the pages on our website and how you interact with the pages.

2.2.4. We process information we collect about you for the following purposes:

- 2.2.4.1. to allow us to administer the account you hold with us;
- 2.2.4.2. to improve our services; and
- 2.2.4.3. to ensure that content from our website is presented in the most effective manner for you and for your device.

2.2.5. For further information on our use of cookies, please refer to section 4 below.

2.2.6. **Information obtained provided by third parties.** Sometimes we may receive information about you from a third party.

This is typically because you are a contact for a customer, supplier or contractor of ours or a prospective customer, supplier or contractor, or you are a sole trader or partner in a legal partnership and somebody else in your organisation has provided us with your information. We process information provided by third parties for the same purposes as set out in section 2.2.2 above.

Additionally, if we run a credit check against you then we will receive information about your creditworthiness from our credit check service provider. We process this information to work out whether you are eligible to receive our services.

What are the grounds for processing your information?

2.3. We are processing your data on the following grounds:

- 2.3.1. where you are a customer of ours, the processing is necessary for the performance of the contract between you and us. This includes where you have instructed us to take some pre-contractual steps (such as obtaining a fee quote or confirmation of a vehicle's availability) prior to us formalising the contract;
- 2.3.2. where you are a supplier or contractor of ours, the processing is necessary for the performance of the contract between you and us. This includes where either of us take pre-contractual steps, such as scoping the arrangement to be entered into;
- 2.3.3. where you are a contact of a customer, supplier or contractor, because we have a legitimate interest in communicating with you to arrange and/or administer the performance of the contract between us and your employer or the organisation you

represent. In accordance with our obligations under data protection law, we have carefully weighed up your interests and fundamental rights and freedoms against our interest to process your information and we are satisfied that we are justified in processing your information for this purpose;

- 2.3.4. where we share your information with third parties, such as our fleet management service provider, roadside assistance and maintenance providers or our trusted vehicle delivery partners, we do so on the basis that, where you are a customer of ours, the processing is necessary for the performance of the contract between you and us. Alternatively, where you are an employee or representative of a customer of ours (e.g. somebody who receives a leased vehicle under a corporate fleet arrangement), we share your information on the basis that we have a legitimate interest in doing so in order to comply with our contractual obligations to the relevant organisation. In accordance with data protection law, we have carefully weighed up your interests and fundamental rights and freedoms against our interest to process your information and we are satisfied that we are justified in processing your information for this purpose;
- 2.3.5. where we perform a credit check using your information, because we have a legitimate interest in ensuring our customers are creditworthy and therefore able to pay our fees. In accordance with data protection law, we have carefully weighed up your interests and fundamental rights and freedoms against our interest to process your information for this purpose and we are satisfied that we are justified in doing so;
- 2.3.6. where we otherwise respond to an enquiry you have made, because we have a legitimate interest in responding to that enquiry and, in accordance with data protection law, we have carefully weighed up your interests and fundamental rights and freedoms against our interest to process your information for this purpose and we are satisfied that we are justified in doing so;
- 2.3.7. where you have opted into receiving marketing communications from us, because you have consented to us processing your information for that purpose. Please see section 3.1.1 below for information on how to withdraw that consent; and
- 2.3.8. where we are sending you marketing communications on the basis that you have previously approached us for a quote and/or are an existing customer of ours (known as the 'soft opt-in' under the Privacy and Electronic Communications Regulations), because we have a legitimate interest in keeping you up to date with our service offerings. In accordance with our obligations under data protection law, we have carefully weighed your interests and fundamental rights and freedoms against our interest to process your information and we are satisfied that we are justified in processing your information for this purpose. In particular, each of our marketing communications gives you the option to opt-out.

Duration and further processing

- 2.4. We only keep your information for so long as it is reasonably necessary. When setting our data retention periods, we consider the amount, nature, and sensitivity of the information we hold, the potential risk of harm from unauthorised use or disclosure of the information and the purposes for which we process the information (including whether we can achieve those purposes by other means). We also take into account our other legal obligations to keep or securely dispose of personal information.
- 2.5. Generally speaking, we retain your information for the following periods of time:
 - 2.5.1. where you (or your employer or the company you represent) and us are party to a contract, we keep your personal information for seven years from the date of termination of that contract. The exception to this is passport and driving licence information which we securely destroy once we have completed the application process;

- 2.5.2. where you (or your employer or the company you represent) make an enquiry with us and/or submit a vehicle hire application that does not result in us entering into a hire agreement then we will securely destroy your personal information at the point the enquiry or application terminates;
- 2.5.3. where there is an enquiry between us which does not result in a contractual relationship arising (including where you are a contact of a customer, supplier or contractor of ours), we keep your personal information for up to one week from the date of our discussions ending unless we expect to use that information to resume discussions and/or enter into a contract with you within the next three months.

2.6. If we need to keep your information for a longer period then we will notify you of the reason and grounds for doing so. This may be the case where, for example, a dispute arises between us. Should this become the case then we will regularly review the duration of these longer periods of retention.

Who is your information shared with?

- 2.7. Your personal information is not shared with anyone except where we are required to do so to comply with the law, to protect our rights or to otherwise provide our services.
- 2.8. In order to achieve these purposes, we will share your data with the following people or groups of people:
 - 2.8.1. we share your information with credit check agencies in order to perform credit checks using your information. These agencies are subject to a strict contractual obligation to treat your personal information sensitively, to keep it confidential and to comply with data protection law at all times;
 - 2.8.2. our outsourced IT providers, including our fleet management service providers, as, in certain circumstances, they require access to unencrypted information on our systems, e.g. to troubleshoot an issue with your account. Our IT providers are subject to strict contractual obligations to treat your personal information with the utmost sensitivity, to keep it confidential and to comply with data protection law at all times;
 - 2.8.3. other outsourced service providers, such as vehicle maintenance and roadside assistance providers and external vehicle transporters. These parties are subject to strict contractual obligations to treat your personal information with the utmost sensitivity, to keep it confidential and to comply with data protection law at all times; and
 - 2.8.4. potential purchasers of our business, subject to those persons entering into strict confidentiality obligations with us and only to the extent permissible under data protection law; and
 - 2.8.5. our professional advisers, including solicitors and accountants.
- 2.9. To the best of our knowledge, understanding and belief, your personal information is not transferred outside of the EEA. If this changes then we will let you know.

Automated decision making

2.10. We do not carry out automated decision making using your personal information. Should this change in the future then we will let you know.

3. YOUR RIGHTS

3.1. Under data protection law you have the following rights:

- 3.1.1. the right to be informed as to what we do with your information. This includes but is not limited to the right to know what information we gather, process and store, what we do with it, who we share it with and how long we keep it for. This information is set out in this Privacy Notice;
- 3.1.2. if we are processing your personal information on the basis of your consent, i.e. where you have opted-in to receive marketing communications from us, then you

have the right to withdraw that consent at any time. Consent can be withdrawn by clicking the unsubscribe links in our emails or by notifying us using the details set out in section 8 below. The lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent;

- 3.1.3. the right to access a copy of your information which we hold. This is called a 'subject access request'. Additional details on how to exercise this right are set out in section 5, below;
- 3.1.4. the right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by leaving certain boxes unchecked on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the details set out in section 8, below;
- 3.1.5. the right to object to decisions being made about you by automated means. At this time, we do not use your personal information for automated decision making but if this changes we will let you know;
- 3.1.6. the right to object to us processing your personal information in certain other situations;
- 3.1.7. the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate; and
- 3.1.8. the right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law.

3.2. From 25 May 2018 you will have the following additional rights under data protection law:

- 3.2.1. enhanced rights to request that we erase, rectify, cease processing and/or delete your information; and
- 3.2.2. in certain circumstances, the right to request the information we hold on you in a machine readable format so that you can transfer it to other services. This right is called 'data portability'. Additional details on how to exercise this right are set out in section 5, below.

3.3. You also have the general right to complain to us (in the first instance) and to the Information Commissioner's Office (if you are not satisfied by our response) if you have any concerns about how we hold and process your information. Our contact details are set out in section 8, below. The Information Commissioner's Office website is www.ico.org.uk.

3.4. For further information on your rights under data protection law and how to exercise them, you can contact Citizens Advice Bureau (www.citizensadvice.org.uk) or the Information Commissioner's Office (www.ico.org.uk).

4. COOKIES

- 4.1. Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.
- 4.2. Our website uses cookies to better the user's experience while visiting. Cookies are also used to ensure that key functions of our fleet management service operate correctly.
- 4.3. Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors. Please note that certain aspects our website, including in particular our fleet management service, may not function correctly (or at all) if you disable cookies in this way.
- 4.4. Our website uses tracking software to monitor visitors and to better understand how they use our website. This software is provided by Google Analytics and uses cookies to track visitor usage. The software will save a cookie to your device in order to track and monitor your

engagement and usage of our website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information (<http://www.google.com/privacy.html>).

4.5. Other cookies may be stored to your device by external vendors when our website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

5. ACCESS TO INFORMATION

5.1. Under data protection law you can exercise your right of access by making a written request to receive copies of some of the information we hold on you. If you make your request before 25 May 2018, you will need to pay a £10 fee. You must send us proof of your identity, or proof of authority if making the request on behalf of someone else, before we can supply the information to you. Requests should be sent to tenders@shb.co.uk.

5.2. From 25 May 2018 you will:

5.2.1. no longer have to pay a £10 fee unless you are requesting copies of documents you already possess, in which case we may charge our reasonable administrative costs. We will also be allowed to charge you for our reasonable administrative costs in collating and providing you with details of the requested information which we hold about you if your request is clearly unfounded or excessive. In very limited circumstances, we are also entitled to refuse to comply with your request if it is particularly onerous; and

5.2.2. in certain circumstances, be entitled to receive the information in a structured, commonly used and machine readable form.

6. DATA SECURITY

We will always store your digital information on secure servers. Unfortunately, however, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to our website or otherwise to our servers (such as by email). Any such 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.

7. CHANGES TO OUR PRIVACY POLICY

This policy was last updated on 3 May 2018. Any material changes we may make to our privacy policy in the future will be uploaded to our website. Please check back frequently to see any updates or changes to our privacy policy.

8. CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Nicola Simpson, SHB Hire Limited, Enterprise House, Vicarage Road, Egham, TW20 9FB email to tenders@shb.co.uk.

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