

S.H.B PRIVACY POLICY

This policy was last updated September 17, 2025.

At S.H.B Hire Limited ("we", "our" or "us" the company), we respect your privacy. We have implemented this privacy policy ("Privacy Policy") to explain our data collection, use, disclosure, and transfer practices, as well as individual access rights you may have when you use our sites and services. The data controller for purposes of your personal information is S.H.B Hire Limited

Our website may, from time to time, contain links to and from partners', 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.

Information We Collect from You

For All Transactions or prospective Transactions:

We collect:

CONTACT INFORMATION, including:

- Title
- Full Name
- Address
- Former Addresses
- Phone numbers
- Email addresses
- Job Title

When Renting or a Prospective Customer

When renting a vehicle, including being added as an authorised additional driver or a prospective customer we may collect:

Driving Qualifications and Identity Verification, including:

- Driver's license information including photos provided by you, or images for verification
- Insurance Information (customer's own insurance)
- Passport
- Dates of the rental
- Type of rental and your vehicle preference
- Ancillary products purchased
- Billing information
- Charges
- Payments
- Debit/Credit Card information

Claims Information

- Information related to details of accidents involving our vehicles, including that of any third parties such as involved individuals, witnesses, and police reports.

Health Information, including:

- Information about relevant health conditions you have that assist us in providing you with adaptive driving devices; or related to claims involving injuries

Optional Information, including:

- Emergency contact information;
- Any preferences or special requirements you may have;
- Personal information shared through the course of building and maintaining a business relationship or otherwise voluntarily shared by individuals.

CCTV and Other Cameras

- Where available, CCTV video recordings and/or photographs of you in public areas of our rental locations

When using our websites

We collect:

Browser Information, including:

- Web logs
- Geo-location

Internet or Other Activity including:

- Browsing or search history
- Information regarding your interactions with our websites, emails, or advertisements.

Your Device Information, including:

- Unique device identifiers
- IP address
- Operating system
- Precise geo-location information
- Location Information

Location Information (where enabled and with your permission) is used for the following purposes:

- Our websites use location information (such as postal code, city, metropolitan or geographic area) from your device to provide services, such as finding a branch or location.

Permissions to use your device's camera enables you to upload your photo ID and/or the vehicle's condition for expedited services (where available).

Permissions to use your device's precise geolocation information, camera or Bluetooth connection can be turned off at any time by changing the settings on your device. Some features or service options may not be available when these items are turned off.

Through our use of cookies and other automated data collection technologies

Except where consent may be required by applicable law, when you visit our websites, open or click on emails we send you, , we or third parties we automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools.

Strictly necessary cookies are used to allow you to navigate a website and use its features, such as accessing secure areas of the website or making a reservation. These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you that amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but if you do so, some parts of the site or may not work. Please note that certain aspects our website, including our fleet management service, may not function correctly (or at all) if you disable cookies in this way. These cookies do not store any personally identifiable information. These types of cookies will expire within 11 months from your last website visit.

Functional cookies allow us to measure website usage and improve website performance and customer experiences, such as remembering the choices you make and providing more personal features like storing your login account and language or geographic preferences. Depending on their function, some of these cookies may expire after your last website visit, while others may remain persistently until they are deleted by you.

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.

You can read Google's privacy policy here for further information (<http://www.google.com/privacy.html>).

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 remain longer or until you delete them.

How can you manage or opt out of cookies?

To opt out to the use of cookies or learn more information about them, click on the "Cookie Setting" button at the bottom of the website you are visiting. You always have the ability to manually delete cookies

You may also set your browser to block all cookies or to indicate when a cookie is being set, although our services may not function properly if your cookies are disabled. To find out how to control or disable cookies within most browsers, consult the "Help" section of your browser.

When Participating in Surveys or Promotions

We collect:

- Marketing preferences;
- Feedback on services provided.

Information We Collect from Third-Parties

- Third parties may provide us with additional information about you or your household, including:

- Referral sources, your employer (general contact information), credit unions, and your insurance provider (general contact and policy information), upon your request, your contact information.
- Third parties who, for fraud prevention purposes, provide us with (if relevant) financial and identity-related verification and document authentication;
- Credit reporting agencies, who facilitate the completion and ongoing credit applications when financing a contract or regulated hire.
- Additionally, if we run identity, credit, or affordability checks against you then we will receive information about you from our third-party service providers to determine your eligibility for the services.
- Service providers, such as customer support (customer service-related information and enquiries made by you), security services (footage of you from our CCTV system), and customer survey providers (your response to our customer service surveys);
- Marketing providers who provide information to assist us to better communicate our products and services, including email acquisition services, data hygiene services, data brokers, and market research partners and platforms;
- Social media content you have made available to the public.

Our Vehicles

Connected Car and Telematics data

Our vehicles may be equipped with telematics devices such as pre-installed event data recorders, global positioning devices, OnStar® and other communications systems that may be connected to the Internet or cellular services. We (and at times the vehicle manufacturer and other authorised third parties) may collect information from these telematics devices and other services and technologies and use and share it as described below or as otherwise set out in this Privacy Policy. This information is associated with the vehicle only and maintained without being linked to an individual. Any information that is linked to you will be treated as personal information in accordance with this Privacy Policy. You are responsible for informing passengers and other drivers that vehicle data is collected and used as described in this section.

- You may also choose to accept or purchase optional devices that enable you to collect certain vehicle data. Please refer to the device manufacturer's terms and conditions and privacy policy.
- The use of telematics devices and other pre-installed services and technologies are subject to our rental terms and conditions and, in some cases, the vehicle manufacturer's and/or technology provider's terms and conditions and privacy policy. For OnStar,

information is available at www.onstar.com. For other vehicle manufacturers, please visit <https://privacy.ehi.com/en-us/home/vehicle-manufacturers.html>. Some or all of these features may be turned on at all times, even when other services or other media in the vehicle are turned off. If you are unsure whether your rental vehicle contains telematics devices or technologies, some or all of these features may be turned on at all times, even when other services or other media in the vehicle are turned off. If you are unsure whether your rental vehicle contains telematics devices or technologies or systems, please speak to a member of our team at the rental location.

- Depending on your type of rental, we collect, and use vehicle data as follows:
 - Fuel information: We use this information to facilitate recording and billing for fuel charges.
 - Odometer information: We use this information to facilitate billing for mileage charges (where applicable) and to help us manage our fleet.
 - Vehicle diagnostic and performance information: We use such information to help us identify vehicle maintenance needs and to manage the fleet.
 - Location information: We collect and use vehicle location information to:
 - Enable our roadside assistance providers to provide you with roadside assistance.
 - Enable emergency service providers to dispatch emergency services to you.
 - Assist us in recovering a vehicle we reasonably believe is lost, stolen, or abandoned.
 - Event data recorders: In certain claims situations we may use this information in connection with accident investigations and claims-related efforts.

Legally Compelled Disclosure and Emergency Circumstances: We may share vehicle information, including location information, where legally compelled or in emergency circumstances. In addition, in the United Kingdom and European Union, our vehicles are required to be equipped with eCall technology, which is activated if your vehicle is involved in an accident. eCall will automatically call and provide information regarding the accident to emergency services. We will also use, disclose and have access to this information. We retain vehicle information based on retention periods in accordance with our business needs and legal requirements. We may use and store this data after the expiry of our contract with you.

Infotainment Systems and Vehicle Manufacturer Apps

If you pair a mobile device with our vehicles' navigation or infotainment systems and choose to use OnStar, Apple CarPlay, Android Auto or other similar third-party software or services on the vehicle or if you choose to use any navigational features on the vehicle's infotainment systems or other device, your personal information and other data may be transferred and stored on these systems. We cannot guarantee the privacy or confidentiality of such information. You should

delete all such personal information and other data from these systems or devices before the vehicle is returned to avoid subsequent occupants of the vehicle accessing this information. If you download a mobile app made available by a vehicle manufacturer or other third party and register the vehicle in that app, your use of the app may result in the sharing of telematics data and other information (including location information and personal information) with the vehicle manufacturer or other third party. Your use of these apps is strictly governed by the third-party mobile apps' terms and conditions and privacy policies. Before the vehicle is returned, you should either remove the app from your mobile device or delete the vehicle from the app.

Children's Privacy

Our websites and online marketing are not directed to, and S.H.B Vehicle Hire does not knowingly collect personal information from, children under the age of 18 or your country's age of minority. If you nevertheless believe that your child has provided us with their personal information and you need to let us know to delete it, please contact us using the link at the top of this page.

How We Use Information About You

We use the information we collect from you or about you to provide you with our services and for the following purposes:

Where it is necessary for the performance of a contract that governs the services we provide to you, including

- To assist the transactions that you (or someone on your behalf) request, such as reserving, renting, motor vehicles or providing fleet management and repair services for motor vehicles;
- Where you are a potential customer, to assess whether we need to make any reasonable adjustments to our products, services, procedures, or processes to account for any vulnerability (such as a physical, mental or financial vulnerability);
- 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;
- 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;
- Where you are a customer, to manage your account with us;
- 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;
- To assist us in making improvements to our products, services, procedures or processes;
- Unless where consent may be required by applicable law, to communicate important information regarding your reservation, rental or lease a vehicle. These communications are transactional in nature and will be sent to you via email, text or calls;
- To provide customer service related to your interactions with us or to respond to your enquiry.

Where necessary for us to comply with a legal obligation, including

- Where you are a potential customer, to carry out an affordability check against the information you have provided in order to determine the appropriateness of our services;
- To use and share information about your vehicle's location with emergency services in the event that you are involved in a road accident;
- To use and share information with government and regulatory authorities when required by law, traffic regulation, or in response to legal process, obligation, or request, including checking appropriate sanction lists or for maintaining public security.

Where it is necessary for our legitimate interests, as listed below, and where our interests are not overridden by your data protection rights, including

- To communicate with you to arrange and/or administer the contract;
- To communicate important information about your rental and provide you great service. These communications, which are transactional in nature, will be sent to you via email, text or calls. To help us provide better products and services: for example, to evaluate our staff's performance, to assess the quality of products and services received and to help us improve our websites, facilities and services. Unless where consent may be required by applicable law, your feedback may be requested via email, text or call;
- To compile statistics and analysis about our customers' use of our websites, products and services. These statistics are used only to enable us to provide better customer service, products, features and functionality to you and other customers in the future;
- Where permissible, to develop a profile of you and your interactions with us so that we can provide tailored offers, opportunities and services that may be of interest to you;
- To protect our legal rights and manage the security of our networks and property, including to protect our websites from spam and abuse. For example, we will use CCTV to ensure the security of our premises;
- For loss prevention, we maintain a record of individuals whose past interactions with us indicate they may present a non-payment or safety risk;
- For fraud prevention purposes, to verify identity and authenticate identity-related documentation as well as additional points of contact for rental related communications through personal references;
- To use and share your information with third parties to permit us to pursue available remedies or limit damage that we may sustain and to enforce the terms of any rental agreement or our websites' terms and conditions;

- To enable us to use vehicle data systems for purposes listed in the Vehicle Data section above, such as assisting in recovering a vehicle we reasonably believe is stolen or abandoned; and to facilitate the vehicle return process (where remote return is available) and billing purposes;
- Unless where consent may be required by applicable law, we may use personal information for marketing and promotional purposes to show you advertisements for products and/or services tailored to your interests on social media and other websites.
- To aggregate personal information collected about you and use it for any lawful purpose;
- To receive, use and share your information with third parties to prevent, detect, and report fraud and protect our business interests and rights, privacy, safety and property, or that of individuals and the public. We will do this to respond to law enforcement request, collect unpaid bills, to avoid liability for penalties you incur (e.g., traffic citations) and for claims processing purposes.

Where you have given consent:

- To assist us in providing you with the most appropriate vehicles, such as those with adaptive driving devices. In some cases, this will require us to infer or explicitly collect information about your health or physical condition;
- Where applicable, to ask for your feedback by email, text or call, to assist us in providing better products and services: for example, to evaluate the performance of our staff, to assess the quality of products and services received and to help us improve our websites, facilities and services;
- Where applicable, to ask if you want to receive by email or text promotional or targeted marketing communications, opportunities and services that may be of interest to you. These will include upgrade announcements, offers and discounts, online communications regarding an incomplete online membership form or reservation, and offers related to other services and products we offer.
- Where applicable, to use vehicle information to assist and manage transactions that you have agreed to and to fulfil obligations under the Rental Agreement;
- You can choose to withdraw your consent at any time; however, such withdrawal does not affect the lawfulness of processing before your withdrawal.

Retention of Your Personal Information

We retain your personal information for as long as we need to fulfil our business purposes, as set out below:

Rental Enquiries

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. 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.

Rental transactions

We may keep the data associated to your rental agreement for up to seven years from the date of the rental or in accordance with our business needs, subject to other local legal requirements. We keep records of payments you have made for two years from the date of the transaction (depending on the location of the rental).

Claims

We keep the data associated to claims involving our renters or other individuals for the life of the claim and up to ten years from conclusion of our obligation, subject to other legal requirements.

Customer service-related queries

We keep general queries for three years, unless you make a complaint, in which case, we keep complaint data for seven years.

Marketing and analytical purposes

We keep data linked to cookies and other online identifiers up to three years. We keep other marketing information, such as email subscription for up to seven years after your last interaction with us.

Disputes & law enforcement

If we are involved in litigation or a governmental or regulatory investigation, then we keep data throughout the period of litigation or investigation and for five years after that. If a settlement means that we must keep data for longer, then we keep data for the period required to administer the settlement. If we provide data to law enforcement agencies, then we keep a record of this for one year beyond the end of the investigation.

Who We Share Information With

As a provider of transportation solutions, we share your information as follows to provide a seamless transactional experience.

Affiliates

We share your **contact, driver qualification, transactional and affiliation, health, optional information, claims information and personal information** with our affiliates for providing the transactions you have requested and (with your consent and where applicable) for marketing purposes. Our affiliates' employees in our IT, marketing, operations and customer service

divisions will use your information, as described in this Privacy Policy, including, if required by applicable law, to send you information about products and services or respond to your inquiry.

Our Service Providers and Business Partners

We will share your:

Contact, driver qualification, transactional, claims information and personal information

- Payment, administrative and technical support providers
- Vehicle recovery agents
- Credit Reporting Agencies
- Identity and address verification providers
- Claims processors
- Vehicle manufacturers and their vehicle repair providers and/or roadside assistance providers
- Fleet providers
- Other providers for vehicle repair and damage assessment purposes
- Professional advisers, including solicitors and accountants.
- Our industry regulators and industry bodies such the Financial Conduct Authority, Financial Ombudsman's Service, Information Commissioner's Office and British Vehicle Rental and Leasing Association.

Health Information

- Claims processors
- Adaptive device providers

Contact and Transactional Information

- Toll and citation processors

Contact, Transactional and Affiliation Information:

- Companies who conduct customer research or satisfaction surveys on our behalf;
- Communication providers which send email, text.
- Customer support providers, such as the provider of our live chat feature, in order to provide you customer service;
- Commercial account partners to manage their account with us, including payment of amounts that may be owed to S.H.B Vehicle Hire under the rental agreement or other agreement. Please see their privacy policy for details about their privacy practices.

Web Information

- Analytics and technology providers for location-based services and to analyze, enhance and manage our data in order to provide, maintain, and improve our services;

- Web session replay partners allow us to replay user sessions to improve browsing experience and troubleshoot errors.

Government Authorities

Your personal information may also be shared with government authorities as outlined above.

Sale, Merger or Change in Control

Your information may also be transferred to another company in the event of a transfer, change of ownership, reorganization or assignment of all or part of S.H.B Vehicle Hire business or assets. This will occur if the parties have entered into an agreement under which the collection, use and disclosure of the information is limited to those purposes of the business transaction, including a determination whether or not to proceed with the business transaction. If required by law, you will be notified via email or prominent notice on our websites of any such change in ownership or control of your personal information or as otherwise may be required or permitted by law.

Testimonials

We may post customer testimonials on our websites which may contain your contact information. We use a third-party provider to manage this process. This provider is responsible for obtaining your consent as necessary, removing content upon your request and answering any questions you may have.

Data Transfers and Processing

SHB may transfer your data to our Group company in the United States. Residents of the UK, when we transfer your personal information and process it in the United States, we do so in accordance with U.K.- and European Commission-approved standard contractual clauses.

Automated Decision Making

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

Your Rights

The data protection laws of the United Kingdom provide the following rights to covered individuals:

- Opt-out of some collection or uses of your personal information, including the use of cookies and similar technologies and the use of your personal information for marketing purposes, and the anonymization of your personal information for data analyses;
- Access your personal information, rectify it, restrict or object to its processing, or subject to exemptions under law, request its deletion;

- Receive the personal information you provided to us to transmit it to another company;
- Withdraw any consent provided (such withdrawal does not affect the lawfulness of processing before your withdrawal); and
- Where applicable, lodge a complaint with your supervisory authority.
- Contact our Data Protection person Nicky Simpson, Commercial Director - Email: customerservices@shb.co.uk, or regulatedhires@ehi.com or our DPO at DPO@ehi.com

Exercising Your Rights

You may exercise any applicable rights described above by accessing [SHB Web Portal](#) If you wish to lodge a complaint with a supervisory authority, in UK you may contact the ICO.

Changes To These Policies

As necessary, we will update our Privacy Policy to reflect changes in our privacy practices. If we make any material changes, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this site or as otherwise may be required or permitted by law, prior to the change becoming effective. We encourage you to periodically review this site for the latest information on our privacy practices.

Contact Us

For questions or inquiries related to privacy and data protection, please visit our website www.shb.co.uk or contact us at SHB, Enterprise House Melburne Park, Vicarage Road, Egham, Surrey, United Kingdom, TW20 9FB.