

Privacy Policy: How we use your information

Connected Vehicle Solutions (CVS) (“we, us, our”) is committed to protecting your privacy. We take great care to ensure your information is kept safe and secure.

This policy explains how we will collect, store, use and share your personal information. We collect information in several ways including when you use our website, we receive data from a third party, or when you use our services.

About us

We are Connected Vehicle Solutions Ltd We can be contacted at:

Address: Gresley House, Ten Pund Walk, Doncaster, DN45HX

Tel No: 0800 7555 253

Email: Info@connectedvehiclesolutions.com

Connected Vehicle Solutions is a video telematics and CCTV device provider.

We work primarily with business partners such as Insurance companies, telematics service providers, lease companies, companies with vehicle fleets (Fleet Management) and resellers.

Explanation of some of the terms used

Data Controller – means the person or entity which alone or jointly with others determines the purposes and means of the processing of personal data.

Data Processor – means the person or entity which processes personal data on behalf of the controller.

Data Protection Law – means the Data Protection Act 2018 and the General Data Protection Regulation ((EU) 2016/679) and any successor laws, regulations and secondary legislation, as amended or updated from time to time, in the UK.

Our Platform – means the Connected Vehicle Solutions platform accessible from our website.

Sensitive Information – this is also known as Special Category Data and includes information revealing, or about a person’s racial or ethnic origin, political opinions or trade union membership, religious or philosophical beliefs, health, sex life or sexual orientation, or genetic data and biometric data for the purpose of uniquely

identifying a natural person. Information about criminal convictions is often included in this definition.

Data Processor and Data Controllers

In respect to our customers, our software provider Fleetly are the data processor and their privacy policy can be found here <https://www.fleetly.tech/en/privacy-policy>. The companies who have contracted with us to provide the goods and services will be the data controller.

Where our services are provided through a reseller, the companies who have contracted with the reseller for us to provide the goods and services will be the data controller.

We will not usually engage directly with the driver of the vehicle; information is provided to us (usually through Our CVS Platform) by the Insurer, telematics service providers lease company, the reseller, or the Fleet Manager.

Where a third-party data controller is involved in the provision of goods and services to you, we recommend that you also review their privacy policy as this will tell you how they will process your information.

Depending upon the types of services you have decided to receive from us (or your company/insurer has elected to provide to you), other companies may also be considered a data controller in respect of those ancillary services. More information about third parties can be found in your data controller's privacy policy or the 'Who do we share the information we collect about you with?' section below.

Data Protection Officer

We have appointed a Data Protection Officer to oversee our handling of personal information. Our Data Protection Officer can be reached at Info@connectedvehiclesolutions.com with the email title FAO DPO

Please click on the relevant section below for detailed information regarding how we process your information.

Who do we collect information about?

Previous, current and prospective customers, Drivers who are authorised to drive the vehicle equipped with the telematics/CCTV device, Fleet Managers, Business Partners (Insurers, and other telematics companies), Resellers & Users of our Platform.

When do we collect information about you?

At the time a product is connected to the Platform (for example driver details will be added to the customer's account on our platform by the data controller) when a new driver is allocated to a vehicle and is added to the Platform, when the vehicle ignition is on although some devices also capture information for a period of time after the ignition is switched off, when our business partners or customers contact us (by phone, email, through our website or otherwise) to update their driver's details,

when a business partner contacts us to make a complaint, a promotion, or survey, or when you report a problem with our website, platform or any other activity undertaken by Connected Vehicle Solutions.

What information do we collect about you?

The personal information that we collect will depend on your relationship with us. We will collect different information depending on the relationship.

In a contract, the type of information will also depend upon the type of service selected and the type of devices installed in the vehicles. The data controller is responsible for ensuring they have a valid legal ground for the processing that they ask us to carry out on their behalf.

Personal Information:

Fleet Manager / Business Partner Contacts / Insurers – General Information such as name, business address, business email, phone number, Vehicle Registration Number (for fleet vehicles).

Insurer policyholders – (Insurance customers only) the level of information collected is determined by the data controller or the customer and the type of device installed but can include: General Information such as policy number, policyholder name, policyholder address, policyholder email, policyholder phone number, policyholder's Vehicle Registration Number, Vehicle tracking information (GPS) recording the location of the vehicle (live tracking and recording time and date), speed, incidents or accidents and mileage, date of birth, driving history and driving behaviour, policy details, photograph, video footage or CCTV audio recording (not all devices and is disabled by default unless the customer completes and submits the Connected Vehicle Solutions Audio Recording Disclaimer).

Drivers of Vehicles – the level of information collected is determined by the data controller and the type of device installed but can include: General Information such as name, residential address (on the basis the vehicle is stored at the drivers home address), business email, phone number, place of work, Vehicle Registration Number, vehicle tracking information (GPS) recording the location of the vehicle (live tracking and recording time and date), speed, incidents or accidents and mileage, date of birth, driving licence details, driving history and driving behaviour

and could include on the basis the customer has deployed a CVS kit (ADAS & DSM) incidents of driver.

distraction and fatigue, smoking, eating, external photograph, video footage or CCTV in-vehicle photograph, video footage or CCTV Audio recording (not all devices).

Both – We may collect information when you use our website and/or Platform including data that allows us to monitor your preferences and how you use our website/Platform. This helps us to organise our website/Platform content in order to improve your experience. The information we collect includes: details of transactions you carry out through our website/Platform, information that you provide by filling in forms on our website/Platform even if those forms are not submitted, technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type, and version, time zone setting, browser plug-in types and versions, operating system and our Platform, information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (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), and methods used to browse away from the page. We may use cookies to collect information about how our website is used. Please see our Policy for more information about our use of cookies.

How do we collect your information?

Fleet Managers / Insurers / Business Partner Contacts Directly from you or from someone else on your behalf by website, Platform, phone, email, SMS, online chat, paper documents.

Drivers of Vehicles – from your Insurer, Fleet Manager, reseller or one of our business partners, from the device installed in the vehicle, from government agencies such as DVLA.

What are the purposes for which information about you is used?

We may process your information for several different purposes. For each purpose, we must have a legal ground for such processing. When the information that we process is classed as a special category or sensitive personal information, we must have an additional legal ground for such processing.

Whether you provide us with the information, or we collect information from You, or we are provided with information from other sources, we may use this information:

- a) To implement the service. *Legal grounds:* Our having an appropriate business need to use your information to provide the contracted services.
- b) To provide and manage your contracted services. Additional legal ground for sensitive personal information: If collected, because the data controller has an appropriate legal ground for processing sensitive personal information.
- c) Communicating with you and resolving any complaints that you might have. *Legal grounds:* Our having an appropriate business need to use your information to manage and respond to complaints which does not overly prejudice you.
- d) To transfer to our business partners for the purpose of providing them with the services required under the contract. *Legal grounds:* Our providing the contracted services. Additional legal ground for sensitive personal information: If collected, because the data controller has an appropriate legal ground for processing sensitive personal information.
- e) Complying with our legal or regulatory obligations. *Legal grounds:* The use is necessary in order for us to comply with our legal obligations.
- f) To improve our customer service. *Legal grounds:* Our having an appropriate business need to use your information in the improvement of our customer service which does not overly prejudice you.
- g) To measure the effectiveness of our advertising. *Legal grounds:* Our having an appropriate business need to use your information to ensure our advertising is effective which does not overly prejudice you.
- h) To provide data analysis to assist us with the pricing of our products and detect market trends. *Legal grounds:* Our having an appropriate business need to use your information which does not overly prejudice you.
- i) To personalise your repeat visits to our website/Platform and to improve our website/Platform, including as part of our efforts to keep our website/Platform safe and secure. *Legal grounds:* Our having an appropriate business need to use your information which does not overly prejudice you.
- j) To notify you about changes to our services or products. *Legal grounds:* Our having an appropriate business need to use your information to keep our customers up to date with changes to our products or services which does not overly prejudice you.
- k) To administer our websites/Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. *Legal grounds:* Our having an appropriate business need to use your information to maintain our websites/Platform which does not overly prejudice you.

l) To allow you to participate in interactive features of our services/website/Platform.
Legal grounds: Our having an appropriate business need to use your information to offer an interactive website/Platform for customers which does not overly prejudice you.

m) Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics. *Legal grounds:* We have a legitimate business need to provide secure and quality services.

Who do we share the information we collect about you with?

Sharing within our Connected Vehicle Solutions (CVS) Business

We may share your information within the CVS Business for the following reasons:

- To administer our websites/Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our website/Platform, including as part of our efforts to keep our website safe and secure.
- To allow invoicing and to recover any outstanding payments.
- For legal, data protection, financial reporting and regulatory purposes.

Sharing with third parties

We may also share your information with selected third parties, to offer services to you or to perform any necessary functions on our behalf. This may include:

- Our business partners or Reseller Partners, such as your insurer, your employer (or their contracted fleet management company) or a third-party telematics company to

whom we provide devices and/or monitoring and reporting services. Access can be via our Platform or in some cases API.

Other third parties our business partner has asked us to engage with:

- Finance Providers
- Credit reference agencies

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- Debt Collectors
- Survey companies
- Data analytics advisors
- Query search engine operators
- Product Installation contractors
- Mapping companies
- Product distribution companies
- Resellers

Disclosure of your personal information to a third party outside of the Connected Vehicle Solutions Business will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also share your information with:

- Search engine operators who can assist us in the improvement of our website/platform.
- Prospective buyers, if we sell any business or assets.
- Regulators and other authorised bodies, whenever we are required to do so by law.
- We believe that such disclosure is necessary to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and to comply with our contractual, legal and regulatory obligations.

We have implemented a Document Retention Policy which specifies how long various types of information should be retained. The Policy is reviewed on a regular basis to ensure that it aligns to current legal and regulatory requirements. The retention periods vary depending upon the circumstances of an individual matter but in general our retention periods for customer facing documentation can be set out as follows:

- Service records – 7 years from the end of the service contract
- Complaints – 3 years from the complaint being resolved

If you would like further information regarding the periods for which your personal information will be stored, please see the contact details outlined in the “How to Contact Us” section below.

Automated decision making

We do not use automated decision making.

What marketing activities do we carry out?

We do not actively market our products & services directly to consumers.

Your rights

Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by

contacting us using the details set out in the “How to Contact Us” section of this Privacy Policy.