

PRIVACY POLICY

INTRODUCTION

At OBL Group we take your right to privacy seriously and we are committed to ensuring that your personal information is handled correctly and is always protected. As part of our business processes we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data is vital.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us.

This policy applies to OBL Group and its associated companies including TSA Service Ltd, On Board Leisure Ltd and Three Service Automatic Ltd (IOM)

We have appointed a Data Protection Officer (DPO) who's email address is DPO@OBLgroup.co.uk

The DPO can be contacted by post at The Data Protection Officer, OBL Group Unit 4 Whitehall Court, Whitehall Park, Leeds LS12 5SN

DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner that ensures appropriate security.

INFORMATION YOU GIVE TO US

We may collect, use, store and transfer different kinds of personal information about you, including:

- **Identity Data** such as your name, title, date of birth, gender,
- **Contact Data** such as your home address, email address and telephone numbers,
- **Financial Data** such as bank account details,
- **Transaction Data** including details about payments to and from you, and other details of products and services you purchase from us,
- **Company Data** including the name of the organisation you represent, and that organisation's Contact Data, Financial Data and Transaction Data,

'SPECIAL CATEGORY' DATA

Special Category Data is information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, and some types of genetic or biometric data.

We do not expect to collect any 'special category' data about you.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We may obtain personal information by directly interacting with you, such as:

- creating an account on our website,
- entering into an agreement with us for products or services,
- subscribing to our services or publications, or
- corresponding by phone, email, social media, our app or by post.

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- analytics providers (such as Google),
- search information providers,
- providers of technical, payment and delivery services, and
- public bodies and regulatory authorities (such as DVLA),

THE LEGAL BASIS FOR OUR USE OF YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent,
- we need to perform a contract we are about to enter into, or have entered into, with you,
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

Particular purposes for which we will use your personal information, and the legal basis for that use, are as follows:

Purposes for which we will use the information you give to us	Legal basis
Where you are acting as a representative of an organisation, then to register that organisation as a new customer	It will be necessary for our legitimate business interests, namely with a view to providing products and services to your organisation
Where you are acting as a representative of an organisation, to process your instructions and, to provide products and services to your organisation (including managing payments, fees and charges)	It will be necessary for our legitimate business interests, namely with a view to providing products and services to your organisation
To obtain further information about you and/or your organisation	It will be necessary for our legitimate business interests, namely to ensure we are fully aware of all issues relating to the products and services we are providing

We will only ever use your personal information for the purposes) for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

IF YOU CANNOT OR WILL NOT PROVIDE US WITH YOUR PERSONAL INFORMATION

Without your personal information, we cannot register you and/or your organisation on our systems and that means that we will be unable to provide you or your organisation with any products or services.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with the parties set out below:

- providers of IT and system administration services to our business,
- our professional advisers,
- analytics and search engine providers that assist us in the improvement and optimisation of our website,
- other personnel within your organisation, or any other organisation that is party to or otherwise has a legitimate interest in the agreement between us and your organisation, and
- public bodies and regulatory authorities.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

KEEPING YOUR PERSONAL INFORMATION SECURE

All information you provide to us is stored on our secure servers in the European Economic Area.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG WE WILL STORE YOUR PERSONAL INFORMATION

The length of time that we will store your data will depend on the legal basis for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations

Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR RIGHTS

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information** we hold about you, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where:
 - the information we hold about you is inaccurate;
 - we are unlawfully using your information;
 - we no longer need to use the information; or
 - we do not have a legitimate reason to use the information.

Please note that we may continue to store your information or use your information for the purpose of legal proceedings or for protecting the rights of any other person.

- You have the **right to ask us to transmit the information** we hold about you to another person or company. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact our DPO by writing to the address at the top of this policy, or by emailing us at DPO@OBLgroup.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

COOKIES AND HOW WE USE THEM

What is a Cookie?

A cookie is a small text file that stores Internet settings. The cookie is downloaded by your Internet browser the first time you visit a website.

Some cookies are extremely useful because they can improve your user experience when you return to a website you have already visited. This assumes that you are using the same device and the same browser as before; if so, cookies will remember your preferences, will know how you use the website, and will adapt the content you are shown so that it is more relevant to your personal interests and needs.

Types of Cookies

There are four categories of cookie: strictly necessary cookies, performance cookies, functional cookies and marketing cookies.

- **Strictly necessary cookies** are essential in order to enable you to move around the website and use its features. Without these cookies, some services cannot be provided – for example, remembering previous actions when navigating back to a page in the same session.
- **Performance cookies** gather information about how a website is used – for example, which pages a visitor frequently visits. These cookies do not save personal information or information that would allow the user to be identified. These cookies are used exclusively to improve the performance of the website, and with it the user experience.
- **Functional cookies** enable a website to save information which has already been entered (such as user names, languages choices, and your location), so that it can offer you improved and more personalised functions. These cookies collect anonymous information and cannot track your movements on other websites.
- **Marketing cookies** are used to deliver adverts and other communications more relevant to you and your interests. They are also used to limit the number of times you see an advertisement and to help measure the effectiveness of advertising campaigns.

Managing the use of Cookie settings on this website

While you can completely disable some cookies in your browser at any time, it is important to note that if you change your settings and block certain cookies, you will not be able to take full advantage of some features of our site.

Cookies that are essential, also known as 'strictly necessary' cookies, enable features without which you would not be able to use the website as intended. These Cookies are only saved on your computer while you are actually browsing the website and for the duration of the session. Strictly necessary cookies cannot be disabled.

OPTING OUT OF RECEIVING COMMUNICATIONS

You can ask us to stop sending you communications at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you.

AUTOMATED DECISION-MAKING

We may employ tools to adapt notifications and website behaviour based upon your use of the OBL Group website and application, such as suggesting vehicles we believe you may be interested in.

LINKS TO OTHER WEBSITES

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

CHANGES TO OUR POLICY

Any changes we make to our policy in the future will be posted on our website.