

HIRECO PRIVACY NOTICE

1. INTRODUCTION

This is the Privacy Notice of Hireco (TL) Limited, Hireco Trailer Sales Limited and Hireco NI Limited (“we”, “our”, “us” or “Hireco”). We take privacy seriously and we are committed to protecting it. This policy explains when and why we collect personal information about individuals, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure.

The relevant Hireco company that you are a customer of is the data controller in relation to the processing activities described in this Privacy Notice – this means that we decide why and how your personal information is processed. When we share personal information with third parties, they may become a data controller in respect of their own processing activities (this includes when we share it with our other group companies).

Where this policy refers to “you” it’s referring to the relevant individuals at the company (including sole traders and partnerships) who is our customer or who makes an enquiry/ corresponds with us. This policy also applies to individual guarantors.

2. PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT

We may collect personal information about you in various ways, including when you use our services, browse or interact with our website, when you call us, interact with us on social media, enter any of our competitions, or promotions, when you provide a testimonial about us or respond to a survey, or if you engage with us in any other way. The categories of information that we may collect about you are as follows:

Personal information you give to us: This is information about you that you give to us. This consists of the following categories of information:

- Name
- Contact details (address, e-mail address, telephone number)
- If you interact with us via social media, information contained in your social media profile(s)
- Bank details of the company that is our customer
- Credit card details of the company that is our customer
- Cardholder and payment details
- Information about the products you/ our customer purchases
- Information contained in our correspondence or other communications with you about our products or business
- Your marketing preferences
- If you are a personal guarantor, we may ask for information about you such as your income, financial means and net worth, and we may ask you to provide a form of identification (usually a utility bill or bank statement)
- In some cases, information about signatories of the agreements that our customer enters into with us, this may include POI status, date of birth and home address
- Legal information or information relating to the claims process relating to claims made by or against you/ the company that is our customer

Personal information we collect about you: We automatically collect information when you visit our website, including the different actions you perform when using our website. This consists of your browser type, operating system, cookies ID and your IP address. We track your activity when you are navigating the site and monitor traffic patterns to help us improve the performance of our website, and to identify and fix problems regarding its functionality. We may also use this information to inform changes we make to our service offering or to our website. This information may be collected by cookies placed on our website (please see our Cookies Policy for more information) – cookies are small pieces of information sent to your device and stored on its hard drive to allow our websites to recognise you when you visit. It is possible to switch off cookies by setting your browser preferences.

We may also collect personal information about you by accessing data from other sources and then analysing that data together with the information we already hold about you in order to learn more about your likely preferences and interests. When you visit our websites, social media pages or mobile applications or click on our advertisements on the online media of other companies, we may collect information about you using technology which is not apparent to you, such as cookies.

Personal information we may receive from other sources: In certain circumstances (such as when you are a director or you apply to be a personal guarantor or you are a sole trader or partnership) we may obtain certain personal information about you from credit reference and fraud prevention agencies. For more information, please see ‘Use by credit reference agencies’ and ‘Use by fraud prevention agencies’ below. If you fail to provide us with

any mandatory information that we request from you, we will not be able to proceed with the credit reference and fraud prevention checks described below and, subsequently, we will not be able to enter into an agreement with you or your company.

We may also receive your contact details and/or details of an enquiry you have raised from other companies within our group of companies.

3. HOW WE USE YOUR PERSONAL INFORMATION

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are explained below.

- **Performance of the contract.** We will use personal information relating to you that we acquire in connection with any agreement that you or your company enter into with us, to manage, administer and take decisions regarding your/ your company's agreement(s) with us, and to generally provide our services to you/ your company (i.e. managing your account, communicating with you, providing updates on the status of your account, dealing with any complaints and notifying you of any changes to this statement). If you are a personal guarantor and entering a guarantee agreement with us, or if your business is a sole trader or partnership, we will use your information to perform our contract with you or to take steps to enter into it. If you are personally liable to us (including where you are a personal guarantor, sole trader or partnership), where necessary, we will use your information to trace your whereabouts to contact you and recover debt.
- **Legitimate interests or that of a third party.** This is for the following purposes:
 - to assess and process your/ your company's application to provide you with products and services, and to assess any risks;
 - to administer the agreement between us and you/ your company and to provide the service under that agreement, including contacting you from time to time about your account;
 - to manage the relationship between us including for customer service purposes;
 - for marketing activities, including tailoring marketing communications to your business;
 - where you are acting in a business capacity, to contact you at your business address, email address and/or telephone number with information about our products and services (you can opt out of these communications at any time);
 - to protect the rights, property or safety of our business including enforcing our agreements, carrying out financial (including credit) and risk assessments;
 - preventing fraud and money laundering, and to verify your identity, in order to protect our business and to comply with laws that apply to us;
 - for assessing the quality of the our service and to provide staff training within the business;
 - to contact you to ask you if you would like to provide a testimonial for publication on our website or other marketing material, or to take part in a survey;
 - for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
 - for analysis to inform our marketing strategy, help us understand how our website is used, and to enhance and personalise your customer experience (including to improve the recommendations we make to you on our website or other sites that advertise on our behalf); and
 - for market research in order to continually improve the products and services that we offer.
- **Compliance with a legal obligation.** We will use your personal information to comply with our legal obligations: (i) to assist any public authority or criminal investigation body; (ii) for activities relating to the prevention, detection and investigation of crime, to conduct credit, fraud prevention and anti-money laundering checks and for compliance with our legal and regulatory responsibilities; (iii) to identify you when you contact us; (iv) to comply with a request from you in connection with the exercise of your rights under data protection laws; and (v) to verify the accuracy of data we hold about you.
- **Vital interests.** We may use your personal information to contact you/ the company that is our customer if there are any urgent safety or product recall notices to communicate to you. The company that is our customer or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your vital interests for us to use your personal information in this way.

4. USE BY CREDIT REFERENCE AGENCIES

Where it is necessary for us to carry out credit and identity checks on you, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, to check your identity, manage your account, trace and recover debts and prevent criminal activity.

We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at www.equifax.co.uk/crain, www.experian.co.uk/crain and www.callcredit.co.uk/crain (please note that the Credit Reference Agency Information Notice or 'CRAIN' is the same for each of the CRAs).

5. USE BY FRAUD PREVENTION AGENCIES

Before we provide services, goods or financing to you, we may undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process your information. If we or a fraud prevention agency, as a result of our processing of your personal information, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing that you have requested or we may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us.

6. OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION

We may disclose your information to the following third parties:

- **Other companies within our corporate group.** We share information within our group of companies where this is necessary for the relevant group company to provide services to you.
- **Our suppliers and service providers.** We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include financing companies, cloud service providers (such as hosting and email management), IT providers, advertising and marketing agencies, communication fulfilment services and administrative service providers. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service.
- **Financial services organisations.** We may disclose your information to financial services organisations, such as companies and banks that provide hire-purchase funding. This is for the purpose of securing such funding on your/ our customer's behalf. These organisations will carry out credit reference and fraud prevention checks in order to enable them to make a funding decision about you and in order to meet their legal and regulatory requirements. Please see 'Use by credit reference agencies' and 'Use by fraud prevention agencies' for information about these searches. These financial services organisations may also share your information within their group of companies who provide services to them and so that they and any other companies within their group can look after your/ our customer's relationship with us and them.
- **Debt collectors.** Third party debt collecting and repossession agencies engaged by us to recover monies owed to us or vehicles owned by us.
- **Credit/debit card payment processors.** When you purchase any products or services online, your credit/debit card payment is processed by Paymentsense, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us using the details at the end of this policy.
- **Legal obligation or for the prevention and detection of crime.** We may transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers. This may include disclosing personal information about you to credit reference agencies, fraud prevention agencies, anti-money laundering agencies and/or counter-financial crime organisations.
- **Business restructure or reorganisation.** We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation.

When disclosing your personal information to third parties, we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

7. AUTOMATED DECISIONS

As part of our processing of your personal information, we may take decisions by automated means.

If you are a sole trader, partnership or personal guarantor, your information will be used to assess your credit risk using an automated decision-making technique called 'credit scoring'. Various factors help us to assess the risk; a score is given to each factor and a total credit score obtained, which will be assessed against a confidential pre-set pass score. We may take other factors into account when determining your credit risk. You may contest a decision made about you by automated means, please contact us by emailing or writing to us.

In regard to fraud prevention checks, this means that we may automatically decide that you pose a fraud or money laundering risk if:

- our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers, or is inconsistent with your previous submissions; or
- you appear to have deliberately hidden your true identity.

8. WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us is stored on our secure servers which are located in Belfast, UK.

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA.

9. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will not keep your information for longer than is necessary for the purposes for which we collect it unless we believe that the law or other regulation requires us to preserve it. When it is no longer necessary to retain your information, we will delete the personal information that we hold about you from our systems.

We keep information relating to the agreements you/ our customer has entered into with us for 6 years after the end of the relevant agreement.

If you receive marketing communications from us we will store your personal information for as long as you are subscribed to our marketing list. If you unsubscribe, we will keep your contact details on our suppression list to ensure that we do not send you any further marketing.

The exceptions to the above are where:

- we need your personal information to establish, bring or defend legal claims or to comply with a legal or regulatory requirement;
- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law or you exercise your right to require us to retain your personal information for a period longer than our stated retention period (see 'Your Rights' below); or
- in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

Credit reference agencies will retain the account information that we give to them for 6 years after your account is closed (please see 'Use by credit reference agencies' for more information about the information that we give to them).

Fraud prevention agencies can hold your information for different periods of time, and if you are considered to pose a fraud or money laundering risk, your information can be held for up to 6 years.

Financial services organisations engaged by us usually hold your information for 6 years from the end of the relevant funding agreement.

10. SECURITY AND LINKS TO OTHER SITES

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our website and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Where we have given (or where you have chosen) a password which enables you to access your account area on our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone and to change your password regularly.

Our website may contain links to other websites run by other organisations. This policy does not apply to those other websites, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

11. YOUR RIGHTS

You have a number of rights in relation to your personal information under data protection laws. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request. Your rights are explained below.

- **Accessing your personal information.** You have the right to ask for a copy of the information that we hold about you. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.
- **Correcting and updating your personal information.** The accuracy of your information is important to us. If you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know.
- **Withdrawing your consent.** Where we rely on your consent as the legal basis for processing your personal information you may withdraw your consent at any time. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.
- **Objecting to our use of your personal information.** Where we rely on our legitimate interests as the legal basis for processing your personal information you may object to us using your information for these purposes. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.
- **Automated decisions.** In certain circumstances, you may contest a decision made about you based on automated processing.
- **Erasing your personal information or restricting its processing.** In certain circumstances, you may ask for your personal information to be removed from our systems. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request. You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.
- **Transferring your personal information in a structured data file (“data portability”).** Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file. You can also ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.
- **Complaining to the UK data protection regulator.** You have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO's website for further details. If you have concerns about the way we have handled your personal information, we encourage you to contact us and we will seek to resolve any issues or concerns you may have.

12. CHANGES TO THIS NOTICE

We may review this Privacy Notice from time to time and any changes will be posted on our website. We may also notify you of any changes in writing where we are required to do so by law. Any changes will take effect immediately upon publication on our website. If you do not agree with any aspect of the updated notice you must tell us immediately and cease using our services.

13. CONTACT US

If you have any queries about this Privacy Notice or the way we use your personal information, or if you would like to exercise any of your rights as listed above, please contact us on:

- Email: info@hireco.co.uk
- Post: Hireco TL Ltd, Hireco Truck Park, The Manorway, Stanford-Le-Hope, Essex, SS17 97E