

# PRIVACY POLICY

TRACKER NETWORK (UK) LIMITED





## TRACKER Network (UK) Limited Privacy Policy

At TRACKER we are aware of the trust you place in us when you buy our products and of our responsibility to protect your information. This Policy describes who we are, why we need to collect your information and how we will use it. We will tell you who we share your information with and how we use it to improve the service we provide to our customers.

### WHO WE ARE

You are giving your information to TRACKER Network (UK) Limited ("we", "us" or "our"). We are registered in England under company number 02632771 and have our registered office at 6-9 The Square, Stockley Park, Uxbridge, Middlesex, United Kingdom, UB11 1FW. We have registered with the Information Commissioner's Office under number Z652055X.

Where we refer to 'you' in this Privacy Policy we mean the Subscriber and any employees or agents of the Subscriber who receive the Services on behalf of the Subscriber in accordance with your subscription agreement with TRACKER. If you have any questions or suggestions, please feel free to contact us by writing to our registered office or e-mailing us at [dataprotection@tracker.co.uk](mailto:dataprotection@tracker.co.uk).

### VISITING OUR WEBSITE

When you visit [www.tracker.co.uk](http://www.tracker.co.uk) and [www.trackerdirect.co.uk](http://www.trackerdirect.co.uk) we use site tracking software and collect standard log information in order to monitor customer traffic patterns and identify the number of visitors to areas of our site and to help us understand how to improve our website. The information we collect is usually anonymous and does not identify individual information about a visitor. We will not associate any data gathered from this site with any personally identifying information from any source.

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## THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, vehicle identification number (VIN), vehicle registration mark (VRM), location and journey data.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes application software, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share statistical or demographic data for any purpose ("Aggregated Data"). Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), nor do we collect any information about criminal convictions and offences.

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## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

## HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - create an account on one of our Apps;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this

personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.

- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - analytics providers;
    - advertising networks; and
    - search information providers.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
  - Identity and Contact Data from data brokers or aggregators.
  - Identity and Contact Data from publicly available sources.

# TRACKER Network (UK) Limited Privacy Policy

## USE OF COOKIES

For information on how we use cookies please read our Cookie Policy (which is deemed to form part of this Privacy Policy) at:

<http://www.tracker.co.uk/footer-links/cookie-notice/>

## HOW WE USE YOUR INFORMATION

We will use your information to manage your TRACKER subscription, services and products (including the TRACKER App, if you download and use it), which may include any or all of the following purposes:

- accounting, billing and audit, payment card verification and screening;
- statistical and marketing analysis;
- customer surveys and customer relations (including by identifying your requirements and preferences);
- providing you with use of TRACKER's website;
- matching your registration details with our vehicle recovery records;
- facilitating insurance claims;
- providing customer services, including to administer, support, improve and develop our business, products and services (including the TRACKER Apps);
- providing marketing assistance and services, including by inviting you to participate in competitions and promotional offers we may run from time to time, and by sending you offers and news about products and services which we think may be of interest to you; and
- managing information you provide when giving us feedback on our products and services.

Unless you let us know you prefer otherwise in accordance with your subscription agreement, we may for all the above purposes contact you by mail, phone (including SMS) and/or electronic means (including email and social media), and also share your information with affiliates of TRACKER from time to time to enable them to contact you in the same ways.



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## HOW WE USE YOUR INFORMATION

We may also utilise the services of other companies and individuals to perform functions on our behalf, including for example to provide subscription information, sending mail and emails, providing marketing assistance and services, and providing customer services. They will in all cases be acting as data processor for TRACKER and will have access to personal information needed to perform their functions, but they will not be entitled to use it for other purposes. They will be required at all times to process subscriber personal information in accordance with this Privacy Policy and as permitted by applicable data protection laws. Any confirmation mail or email from TRACKER or an affiliate of TRACKER (or another company or individual performing functions on TRACKER's behalf) may contain marketing material, including information which we think may be of interest to you from time to time. You will be able to unsubscribe at any time by clicking the unsubscribe button within the email or contacting us to request this.

Your information includes all the details we hold about you and your transactions. We will only collect the information we need so that we can provide you with the products and services you expect from us in accordance with this Privacy Policy.

## LEGAL BASIS FOR PROCESSING YOUR DATA

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data: including for the performance of our contract with you, where it is necessary to comply with a legal obligation or where it is necessary for our legitimate interests such as for the running of our business and/or to keep our records updated and to study how customers use our services. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data, other than in relation to sending direct marketing communications to you via email, text message etc. You have the right to withdraw consent to processing your data at any time by contacting us including any marketing.

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## CHANGE OF PURPOSE

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## WITH WHOM WE WILL SHARE YOUR INFORMATION

During the course of our dealings with you we may need to disclose some of your information to insurers, third party underwriters, reinsurers, credit reference, fraud prevention, and law prevention agencies and other companies that provide service to us to:

- assess financial and insurance risks;
- recover debt; and/or
- prevent and detect crime (i.e. sharing your information with the Police as and when necessary).

We do not disclose your information to anyone other than TRACKER (and, in accordance with this Privacy Policy, our affiliates from time to time) except:

- where we have your permission to do so;
- when we are required or permitted to do so by law;
- where we may transfer rights and obligations under an agreement;
- to prevent and detect crime (which will include sharing your information with the Police when necessary or appropriate).

From time to time we may require services from suppliers that are located outside the UK but within the EEA, and your information may be shared with them for the purposes of providing that service. Where we engage these suppliers, we make sure that they apply the same levels of protection, security and confidentiality that we apply to your information.

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### CREDIT REFERENCE, FRAUD PREVENTION & OTHER AGENCIES

We may obtain information about you from credit reference agencies and fraud prevention agencies to check your credit status and identity. The agencies will record our enquiries, which may be seen by other companies who make their own credit enquiries. If you provide false or inaccurate information and we suspect fraud, we will record this, and your details may be passed to fraud prevention agencies. Use of your information by these agencies is outside the scope of this Privacy Policy.

Please take time to read the following as it contains important information relating to the details you have given or should give to us. You should show this Policy to anyone whose data has been supplied to us in connection with your TRACKER subscription.

- We may monitor and record telephone calls and communications with you via social media in order to improve our services and to prevent and detect crime.

#### **To prevent and detect fraud we may at any time:**

- Share information with other organisations and public bodies including the Police, although we will only do so in compliance with applicable data protection laws;
- Check and/or file details with fraud prevention agencies and databases, and if we are given false or inaccurate information and we identify fraud or suspected fraud, we will record this, and your details may be passed to fraud prevention agencies.

#### **We and other organisations may also use and search these agencies and databases from the UK and other countries to:**

- Trace debtors or beneficiaries, recover debt, prevent fraud and manage your accounts;
- Check your identity to prevent money laundering (which we may in our discretion waive if you provide us with other satisfactory proof of identity);
- Law enforcement agencies, which may access and use this information.

#### **We and other organisations may also access and use this information to prevent fraud and money laundering, for example when:**

- Managing credit and other facilities and recovering debt;
- Checking details of job applicants and employees/other personnel.





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**We and other organisations that may access and use information recorded by fraud prevention agencies, may do so from other countries.**

We can provide the names and addresses of the agencies we use. To obtain a copy of your information held by them, please contact TRACKER Network (UK) Limited, at 6-9 The Square, Stockley Park, Uxbridge, Middlesex, United Kingdom, UB11 1FW quoting your reference.

## DIRECT DEBIT

If you have chosen to pay for a TRACKER device or subscription by direct debit, debit or credit card, we may retain your payment details securely so that we can take your payment at the next payment date in accordance with the terms of the Agreement. You may withdraw this consent at any time by emailing or writing to us, but this may affect timeliness of payments which may in turn affect the subscription.

## SECURITY TO PROTECT YOUR INFORMATION

As required by data protection law, we follow strict security procedures and protocols in connection with the storage, processing and disclosure of your information, to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Whenever we share your information with a third party (which we will only do in accordance with this Privacy Policy), we will ensure that the security measures employed by any such third party in relation to the storage and processing of your information are at least as rigorous as those employed by TRACKER. This does not apply where we are required by law to pass your information on to any third party.

## RETENTION OF YOUR DATA

We will retain your information for six years after the business relationship has ended, or longer as required by law and/or, regulatory agencies such as the Financial Conduct Authority, HM Revenue and Customs.

# TRACKER Network (UK) Limited Privacy Policy

## KEEPING YOU INFORMED

We would like to keep you informed by letter, phone and electronic means (including e-mail and mobile messaging) about products, services and additional benefits that we believe may be of interest to you. If you don't want us to do this, please tell us the next time you call or contact us by writing to our Data Protection Officer at our registered office noted above or by e-mailing us at [dataprotection@tracker.co.uk](mailto:dataprotection@tracker.co.uk).

## YOUR RIGHTS

You have the following rights:

- the right to ask us to provide you with a copy of the personal information that we (including partner and affiliate agencies processing your data on our behalf) hold about you at any time free of charge.  
We reserve the right to charge the administrative cost of providing you with the requested information in situations where your request is excessive or unfounded, for instance where your request is repetitive, or you require multiple copies;
- the right to ask us to update and correct any out-of-date or incorrect personal information that we hold about you free of charge;
- the right to opt out of any marketing communications that we (or any third party to whom we have disclosed your personal information with your consent) may send you.  
All of our marketing communications will give you the opportunity to unsubscribe from receiving further marketing communications from us and you can e-mail us at [dataprotection@tracker.co.uk](mailto:dataprotection@tracker.co.uk) to request an update to your marketing preferences and
- the right to ask us to delete your personal information that we hold. We will erase your information if there are no applicable laws or regulations barring us from doing so.

If you wish to exercise any of the above rights, please contact us by writing to our Data Protection Officer at our registered office noted above or by e-mailing us at [dataprotection@tracker.co.uk](mailto:dataprotection@tracker.co.uk).



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### THIRD PARTY SITES

Our websites may contain links to other websites operated by third parties. Our Privacy Policy applies only to the personal information that we collect through this website and we cannot be responsible for personal information that third parties may collect, store and use through other websites. You should always read the privacy policy of each website you visit to understand how its use may impact you.

### COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



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