

Privacy Policy

This privacy policy sets out how "Pink Salary Exchange" uses and protects any information that you give "Pink Salary Exchange" when you use this website.

"Pink Salary Exchange" is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

"Pink Salary Exchange" may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 01/07/2018.

Who We Are

We are Pink Salary Exchange, a company registered in England & Wales (company 11904786) whose registered office is at Southpoint House, Harcourt Way, Meridian Business Park, Leicester, LE19 1WP. We are a Data Controller or a Data Processor depending on the circumstances for the purposes of the General Data Protection Regulations (GDPR) 2018.

How to Contact Us

If you have any questions about this privacy policy or our GDPR policies generally, please contact us:

- ❖ By Post: Data Protection Officer, Southpoint House, Harcourt Way, Meridian Business Park, Leicester, LE19 1WP
- ❖ By Email: GDPR@pinkvehicleleasing.co.uk
- ❖ By Phone: 0116 4026500

Customers / Drivers

What is personal data?

Personal Data means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

What information do we collect and process?

We receive information from you or your company when you become a customer of Pink Salary Exchange in order for us to provide the service(s) as per the contract in place. The personal data you provide may include your name, postal address, e-mail address, phone number, date of birth, salary, username & password, IP Address, title & marital status, NI Number, Driver Licence number, Vehicle

details, Payroll / Employee ID, digital signature, financial and payment information, employment history, credit history, identification records and other information about yourself. This information is required to enable us to provide you with a vehicle or other related services and without this information we may not be able to offer you some of our products and services. You may also provide contact details and other personal data when you voluntarily participate in a competition, special offer, promotion or survey or where you provide feedback on our products and services. You are not required to provide any such information in these circumstances, and this will not affect any of our services which we may provide to you.

We also collect information from other sources:

- ❖ Driving Licence Checks – we use information provided by Driving Licence agencies when assessing your application. For “Drivers” of our customer you will be asked to complete a Driver Mandate which will be sent to the DVLA or Drive Tec (for Foreign Licences). The information received from these companies will be used in accordance with your company’s policy. We will be checking for points, endorsements, driving licence revokes and will use this information to confirm if you are authorised to drive your company’s vehicle and will pass this onto your company for insurance purposes.

How is your information used?

We will use your information to manage your account with us, process any requests for quotes or any orders that you have submitted and carry out our obligations arising from any orders / contracts / services that you have entered into. We may use automated decision making in regard to your personal data for elements of our services and products, for example to generate a list of vehicles for you, undertake driving licence checks and to generate quotes for vehicle insurance.

Who has access to your information?

Our staff have access to your personal data to support and provide guidance on our products and services and to carry out our obligations arising from any contracts that you or your employer have entered into.

We may also share your information with other third party service providers, also known as Data Processors, to complete tasks and provide services to you on our behalf. However, when we use third party service providers, we only share the personal information that is necessary to deliver a service and our contract requires them to keep your information secure and not to use it for their own purposes, for example they will not use it for direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Examples of services where we may use third party service providers include:

- ❖ Driving licence checks
- ❖ Vehicle ordering, delivery and collection systems and services
- ❖ DVLA
- ❖ Vehicle dealerships
- ❖ Vehicle insurance
- ❖ Service bookings and garages
- ❖ Breakdown and accident assistance
- ❖ Tyres and windscreens
- ❖ Fines management
- ❖ Customer surveys and feedback
- ❖ Direct debit and payment handling
- ❖ Daily rental providers
- ❖ Digital signature services

Lawful processing

When we process your personal data for the purposes of processing quotes or orders, including rectifying your data to ensure its accuracy, we do so on the basis of performance of a contract with you or taking steps with the intention of entering into a contract with you for our services.

How long do we retain your data?

We retain your personal data until seven years after expiry of all contracts for services with you which is required for the purpose of auditing and complaints. We may in certain circumstance retain personal data for longer where it is lawfully authorised or we are required to do so.

Visitors to the website

What information do we collect and process?

When you visit our website, we use third party services to automatically collect information about your computer, including your IP address, information about your visit, your browsing history, and how you use our website. We use cookies within our website. You can read more about how we use cookies in our separate Cookies Policy. If you contact us via our website, please see the "People who contact us" section below.

How is your information used?

We use your information collected automatically from our website to improve the customer experience and functionality of our website. We may also use this information to send you communications of products or services that may be of interest to you.

Who has access to your information?

Our Marketing team has access to analytic platforms and tools that collect and process website visitor information.

Lawful processing

When we process your personal data for the purposes of improving our website, we do so on the

basis of our legitimate interests in maintaining a relevant and functioning website and improving customer experience. We only use personal data obtained from the website to contact you if we feel there is a legitimate reason to inform you of the products and services we offer.

How long do we retain your data?

We retain personal data collected automatically from our website until we no longer have any reasonable reason to use it as long as it is valid, accurate and up to date or until such time that you choose to unsubscribe; or instigate your right of erasure (see section 12 Right of erasure)

Users

Users are any individuals who have logged into our website and created accounts to quote or order products and services from us. This includes organisations utilising our site to manage their schemes.

What information do we collect and process?

We receive information from you when you register an account with us search our website for a vehicle, request a quote for a vehicle, order a vehicle from our site or communicate with us by phone, e-mail, live-chat or otherwise.

The personal data you provide may include your name, postal address, e-mail address, phone number, date of birth, salary, username & password, IP Address, title & marital status, NI Number, Driver Licence number, Vehicle details, Payroll / Employee ID, digital signature, financial and payment information, employment history, credit history, identification records and other information about yourself. This information is required to enable us to provide you with a vehicle or other related services and without this information we may not be able to offer you some of our products and services.

You may also provide contact details and other personal data when you voluntarily participate in a competition, special offer, promotion or survey or where you provide feedback on our products and services. You are not required to provide any such information in these circumstances, and this will not affect any of our services which we may provide to you.

We also collect information from other sources:

- ❖ Driving Licence Checks – we use information provided by Driving Licence agencies when assessing your application. Information may include details of any points on your licence.

How is your information used?

We will use your information to manage your account with us, process any requests for quotes or any orders that you have submitted and carry out our obligations arising from any orders / contracts / services that you have entered into. We may use automated decision making in regard to your personal data for elements of our services and products, for example to generate a list of vehicles for you, undertake driving licence checks and to generate quotes for vehicle insurance.

Our website may contain links to other third party websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you

provide whilst visiting such sites and such sites are not part of this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Who has access to your information?

Our staff have access to your personal data to support and provide guidance on our products and services and to carry out our obligations arising from any orders that you have entered into.

We may also share your information with other third-party service providers, also known as Data Processors, to complete tasks and provide services to you on our behalf. However, when we use third party service providers, we only share the personal information that is necessary to deliver a service and our contract requires them to keep your information secure and not to use it for their own purposes, for example they will not use it for direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Examples of services where we may use third party service providers include:

- Driving licence checks
- Vehicle ordering, delivery and collection systems and services
- DVLA
- Vehicle dealerships
- Vehicle insurance
- Service bookings and garages
- Breakdown and accident assistance
- Tyres and windscreens
- Fines management
- Customer surveys and feedback
- Direct debit and payment handling
- Daily rental providers
- Digital signature services

Lawful processing

When we process your personal data for the purposes of processing quotes or orders, including rectifying your data to ensure its accuracy, we do so on the basis of performance of a contract with you or taking steps with the intention of entering into a contract with you for our services.

How long do we retain your data?

We retain your personal data until seven years after expiry of all contracts for services with you which is required for the purpose of auditing and complaints.

People who contact us by phone, e-mail, LiveChat or other means

What information do we collect and process?

Telephone - When you call us, we may collect your telephone number. All telephone calls are recorded.

E-mail - We will collect your name, e-mail address, ip address and the contents of your message and any attachments.

LiveChat - We will collect your name, email address and a transcript of the LiveChat conversation.

Other social media - If you contact us via Facebook, LinkedIn or other social media, we will collect your name and/or online avatar and any other personal information that you make available to us on these platforms.

How is your information used?

We may use any information obtained by phone, e-mail, LiveChat or other social media to:

- ❖ Help identify Pink Salary Exchange's staff training needs and improve staff performance
- ❖ Establish the facts in the event of a complaint either by a customer or a member of staff and so assist in resolving it;
- ❖ Assist in quality control to identify any issues in processes
- ❖ Customer assurance / security

Who has access to your information?

Our staff have access to any personal data collected by phone, e-mail and LiveChat, via our in-house customer management systems, so they can provide support and guidance and respond to customer queries. We have a contractual agreement in place with a third-party provider to supply and support our phone system and our LiveChat facility. We do not permit this provider to access or process your data except in accordance with our instructions.

Lawful processing

When we process your personal data in connection with telephone calls, LiveChat sessions, e-mails or social media, we do so on the basis of:

- ❖ Where relevant, communications in connection with the performance of a contract with you (via your employer)
- ❖ Our legitimate interests to discuss our products and services with you, in creating and retaining records of such communications for training purposes and for evidentiary purposes or to respond to customer queries.

How long do we retain your data?

Where a communication is relevant in connection with a contract or proposed contract relating to you (via your employer), we retain any related personal data in accordance with the retention periods set out in paragraph 5.5 above. In all other circumstances, we retain recordings, transcripts, e-mails and other copies of communications for a maximum period of 7 years for the purposes of auditing and complaints.

Marketing

Marketing communications

If you have provided us with business contact details, we will send you marketing information by post, telephone, e-mail, text or other electronic instant messages where it is in our legitimate interests in pursuing sales leads to do so (provided that you have not opted out of such communications and provided that it constitutes fair processing of your personal data to do so). If you have provided us with personal contact details, we will only send you marketing e-mails or texts or other electronic instant messages where you have specifically consented to receive such communications. We may provide you with marketing information by post or by telephone where it is in our legitimate interests in pursuing sales leads to do so (provided that you have not opted out of such communications or subsequently withdrawn consent and provided that it constitutes fair processing of your personal data to do so).

Marketing preferences

You can also opt out of any marketing communications by:

- ❖ Clicking on the "unsubscribe" links in any marketing e-mails
- ❖ Emailing us at sales@pinkvehicleleasing.co.uk or by calling us on 0116 4026500
- ❖ If you have signed up to receiving marketing from us by text, replying STOP to the last message you received from us.

Who has access to your information?

Our marketing staff have access to any personal data obtained for marketing purposes. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes. We may also use the services of third party marketing companies and platforms, including;

- ❖ Customer surveys and feedback
- ❖ Product and service reviews
 - ❖ Analytics platforms
 - ❖ SMS services
 - ❖ Emailing services
- ❖ Marketing printing and postal services

Lawful processing

When we process your business contact data for marketing purposes, we do so on the basis of our legitimate interests in pursuing sales leads to inform you of the services and products we offer. When we process your personal contact data for marketing purposes, we do so on the basis of your consent or in limited circumstances on the basis of our legitimate interests in pursuing sales leads.

How long do we retain your data?

We retain your information on an ongoing basis whilst you continue to opt-in. If you unsubscribe or opt-out we will retain your details for a maximum of 7 years for the purposes of auditing or complaints. If you wish to be "forgotten" then please exercise your right under section 12 right of erasure.

Retention of data generally

We retain personal data for as long as necessary to provide the products and services you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes and enforcing our agreements. Because these needs can vary for different data types in the

context of different products, actual retention periods can vary significantly. We therefore categorise data and review the retention periods for each set of data. This ensures that we never hold any personal information for longer than is required to provide our products and services to you, or for longer than we are legally bound to or otherwise have a legitimate interest to. We review our retention periods on a regular basis to ensure they are up to date.

How you can access and update your information

The accuracy of your information is important to us.

You can contact to make an update to your information by email: sales@pinkvehicleleasing.co.uk or by telephone on 0116 4026500

You also have the right to ask for a copy of the personal information and data we hold about you. All requests must be in writing, and it would be helpful if any such request also indicates what information you are seeking and between any particular dates. All requests for access to personal data should either be sent by email to: GDPR@totalmotion.co.uk or by post to: Data Protection Officer, Pink Vehicle Leasing Limited, Southpoint House, Harcourt Way, Meridian Business Park, Leicester, LE19 1WP.

How secure is your information?

The secure protection of your information is extremely important to us, and we have implemented advanced controls and measures to remove risks to your information and protect against loss, misuse, or unauthorised access. Any personal information is protected with 128-Bit encryption. When you are on a secure page, a padlock icon will appear near the URL, showing that your connection with the Pink Salary Exchange's website is secure and encrypted.

Data transfers

We do not transfer any personal data outside of the European Economic Area (EEA).

Your rights

Your personal data is protected by legal rights, which include your rights to:

- ❖ Right to be informed
- ❖ Right of access – we provide you with a copy of the personal data we hold about you.
- ❖ Right of rectification - we rectify any personal data that we hold about you.
- ❖ Right to erasure - we erase any personal data that we hold about you.
- ❖ Right to data portability - to obtain from us all personal data that we hold about you in a structured, machine readable form, and have this information transmitted to another organisation
- ❖ Right to object - to object to our processing your personal data in certain ways
- ❖ Rights related to automated decision-making including profiling
- ❖ If you want to exercise any of these rights, please contact us using the details below. As per the regulations we will respond within a month to your request.

Right to Erasure (to be “forgotten”)

If you wish for your details to be erased (“forgotten”) then please email GDPR@totalmotion.co.uk. We will do our utmost to delete all of your details from our records.

However, under Article 17 (3) some of your details will not be erased for the following reasons:

- ❖ To exercise the right of freedom of expression and information.
- ❖ To comply with a legal obligation under EU or member state law.
- ❖ For public health purposes in the public interest.
- ❖ Archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.
- ❖ The exercise or defence of legal claims.
- ❖ In these circumstances we will only retain the necessary details/data to adhere to the reasons given.

Data protection complaints

All complaints regarding our handling of personal information will be logged and actioned by us and treated seriously. Any complaints of this nature should be made to the Data Protection Officer at GDPR@pinkvehicleleasing.co.uk or in writing to Data Protection Officer, Southpoint House, Harcourt Way, Meridian Business Park, Leicester, LE19 1WP

Fair Processing Notice

We will also provide your information, and, if applicable, your business partners’ information, to the following fraud prevention agencies to prevent or detect fraud and money laundering, and to verify your identity and your business partner’s identity:

National Hunter Limited, PO Box 4744, Stone, ST15 9FE, www.nhunter.co.uk; CIFAS, 6th Floor, Lynton House, Tavistock Square, London, WC1H 9LT www.cifas.org.uk.

If you give us false or inaccurate information or we suspect or identify fraud we will record this and may also pass this information, including the names of the partners in your business at the time of the fraud, to our Group Companies, fraud prevention agencies and other organisations such as law enforcement agencies involved in fraud prevention to detect, investigate and prevent crime. We do this as we have legitimate interest in preventing fraud and money laundering.