

PRIVACY POLICY



Introduction

Welcome to Xtrac Limited's privacy policy

Xtrac Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how, and our Group Companies (the Xtrac Group) look after your personal data and tell you about your privacy rights and how the law protects you.

Purpose of this privacy policy

This privacy policy aims to give you information on how Xtrac Group collects and processes your personal data including any data you may provide through this website when you sign up to our newsletters, engage us to provide services or goods to you, or sell goods or services to us.

This website is not intended for children and we do not knowingly collect data relating to children in the course of our business.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller's contact details

Xtrac Limited is the controller and responsible for your personal data (collectively referred to as "Xtrac Limited", "we", "us" or "our" in this privacy policy).

You can contact us in one of the following ways:

Email address: dataprotection@xtrac.com

Postal address: Gables Way, Kennet Park, Thatcham, Berks RG19 4ZA, England

Telephone number: +44 (0) 1635 293 800

EU Representative

We have appointed DataRep to act as our EU Representative. If you are based in the EU and wish to exercise your rights under the EU General Data Protection Regulation (EU GDPR), or have any queries in relation to your rights or general privacy matters, please email our representative at contact@datarep.com. Please include reference to "Xtrac Group" in any correspondence you send to our representative. Alternatively, you may contact us directly at dataprotection@xtrac.com

Changes to the privacy policy and your duty to inform us of changes

We may change this privacy policy from time to time and any changes will be posted to this page. Please check back to see if there have been any changes or updates.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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).

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

- **Identity Data** includes first name, last name, username or similar identifier, marital status and title.
- **CCTV Data** moving or still images, voice of you and your belongings e.g. vehicles, when entering the monitored space in our premises, buildings and facilities through the CCTV devices and system (“CCTV Data”).
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes 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.
- **Commercial Data** includes information about goods or services you sell to, or order from, us or the Xtrac Group.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from the Xtrac Group and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. 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.

With the exception of job applications, 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.

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 to provide legal services 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 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:
 - ask us to provide services;
 - subscribe to our email newsletters; or
 - give us some feedback.

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- when you apply for a job role with us
- **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.
- **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 analytics providers such as Google.

How we use your personal data

- We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- Where we need to perform the contract we are about to enter into or have entered into with you, your employer or company.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights are not affected by those interests.
- Where we need to comply with a legal or regulatory obligation.

How we use specifically your CCTV data

We may collect, capture, use, disclose, transfer, and carry out any operation, including but not limited to recording, holding, adapting, altering, modifying, destroying, deleting, retrieving, combining, copying, transmitting, storing, extracting, amending, adding, in relation to your CCTV Data and other Personal Data concerning you, for the “CCTV Monitoring Purposes” as listed below, on the legal basis of legitimate interests; vital interest; legal compliance; public interest; consent; or any other basis as permitted by applicable laws (provided that those interests are not overridden by individuals’ rights and interests), as the case may be:

- to protect your life, body, health personal safety, and/or your belongings;
- to control access to building and to ensure the security of the building, the safety of our personnel, employees and visitors, as well as our property and information located or stored on the premises.
- to protect/prevent our premises, buildings, facilities and assets from damage, disruption, vandalism and other crime;
- to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- to assist in the investigation or proceedings concerning a whistleblowing complaint;
- to assist in the establishment or defense of any civil litigation, including but not limited to employment proceedings;
- to comply with our legal obligations and/or cooperate with court, regulators, government authority and law enforcement bodies for the exercising of such official authority vested in us including but not limited to safety, occupational and workplace environment laws. We consider that use of CCTV is a necessary measure to enable us to meet those obligations; and
- to exercise our rights or protect our legitimate interest where it is necessary to do so, for example to deter, prevent, and detect of misconduct, crime or violations of law; to follow up on incidents; to prevent and report misconduct or crime in our stores and to protect the security and integrity of our business. We will endeavor on the continuing basis to balance between our legitimate interest and that of any relevant third parties, as the case maybe, and your fundamental rights and freedom in relation to the

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protection of the CCTV Data concerning you. We will also endeavour to identify any steps required to achieve the right balance as appropriate.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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. 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 regularly check this privacy policy for any changes.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you or your employer or company as a new customer or supplier	(a) Identity (b) Contact (c) Financial & Commercial	For our legitimate interests in supply or purchasing goods and or services
To process and deliver your order including: (a) Manage payments, fees and charges on behalf of your employer or company (b) Collect and recover money owed to us by your employer or company	(a) Identity (b) Contact (c) Financial & Commercial (d) Marketing and Communications	(a) For our legitimate interests in managing our ordinary business (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with your employer or company which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) providing information to our financial or professional advisors or HMRC	(a) Identity (b) Contact (c) Marketing and Communications (d) Financial & Commercial	(a) For our legitimate interests in managing our ordinary business (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our goods and/or services)
To process a job application	(a) Identity (b) Contact (c) Special category data	(a) For our legitimate interest in filling our vacant positions (b) Necessary for the purposes of carrying out the obligations in the field of employment

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To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) For our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and email newsletters to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical (f) Commercial	(a) For our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, client relationships and experiences	(a) Technical (b) Usage (c) Commercial	(a) For our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications (f) Commercial	(a) For our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Marketing from us

We may use your Identity, Contact, Technical and Usage Data to form a view on our goods and or services we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from the Xtrac Group if you have requested information from us, or you, your company or your employer has purchased goods or services from us and you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or

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by following the opt-out links on any marketing message sent to you, or by contacting us at dataprotection@xtrac.com at any time.

Where you opt out of receiving these marketing messages, we will continue to process your data as set out in this privacy policy.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy on our website.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Xtrac Group companies
- Third parties who provide goods or services to us
- Third parties if it is necessary to comply with a legal obligation or a decision of a judicial authority, government body, or if a disclosure is necessary for national security, law enforcement or other public interest
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy

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

International transfers

Due to the nature of Xtrac business, your personal data may be shared, disclosed and transferred between the Xtrac Group where such transfers are required for legitimate business reasons. Some of our Xtrac Group are based outside of the EU/UK. Your personal data may be transferred to the US where the level of protection for personal information is not the same as in the UK or EU. Xtrac take steps and implements measures to keep your information secure to ensure a similar degree of protection.

Where we use certain service providers or transfer your personal data outside the UK or EU, we may use specific approved contracts which give personal data the same level of protection.

Data security

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.

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How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Your legal rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your personal data. Please contact us at dataprotection@xtrac.com to make a request relating to any of your rights set out below:

- **Request access to your personal data** – You have the right to ask us for copies of your personal data. This right always applies. There are some exemptions, which means you may not always receive all the information we process.
- **Request correction of your personal data** – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.
- **Request erasure of your personal data** – You have the right to ask us to erase your personal data in certain circumstances.
- **Object to processing of your personal data** – You have the right to object to processing if we are able to process our information in our legitimate interests.
- **Request restriction of processing your personal data** - You have the right to ask us to restrict processing of your information in certain circumstances.
- **Request transfer of your personal data** – This right only applies to information you have given to us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into contract and the processing is automated.

You are not required to pay any charge for exercising your rights and we may ask you to provide information to help us confirm your identity. We have one month to respond to 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), or your local supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach any supervisory authority so please contact us in the first instance.

Xtrac Contact Details:

Postal address: Gables Way, Kennet Park, Thatcham, Berks RG19 4ZA, England

Email address: dataprotection@xtrac.com

Telephone number: +44 (0) 1635 293 800

ICO Contact Details:

Postal address – Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Email – icocasework@ico.org.uk

Telephone - 0303 123 1113

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