

## Privacy Notice

Last updated: 21<sup>st</sup> November 2019

### Introduction

This is the privacy notice of Pound Gates Vehicle Management Services Ltd. T/A. Sevatas (company number: 2277851). Our registered office is Hyde Park House, Crown Street, Ipswich, IP1 3LG, UK. Sevatas is a trading style of Pound Gates Vehicle Management Services Ltd. and are referred to as **we**, **us** or **our** in this privacy notice.

The privacy and security of your personal data is very important to us so we want to assure you that your information will be properly managed and protected by us at all times. Please read this privacy notice carefully as it explains how we may collect and use your personal data. This privacy notice also provides certain information that is legally required and lists your rights in relation to your personal data.

This privacy notice relates to personal data that identifies you as a natural person whether you are an actual or potential customer, an individual who browses our website or an individual outside our organisation with whom we interact.

For the purposes of relevant data protection legislation, we are a **controller** of your personal data. As a controller we use (or **process**) the personal data we hold about you in accordance with this privacy notice.

### Information we collect and hold about you and where we obtain this from

We will only ask for information that we need. We collect personal data to be able to provide our services (for example, administering a claim on your or a third party's behalf in which you have an interest). Without the information we ask for we wouldn't be able to provide our services.

The personal data that we collect may include the following:

- Personal data you provide us with in person, via our website, by telephone and in writing, including by email
- Personal data you provide when you enquire about the services we offer, or issues relating to third party activity for which you and we have an interest like inspection data or claims information
- Personal data you provide when you submit a claim directly to us for processing, or where a claim is submitted to us on your behalf
- General information about you and/or your employees, such as name, address and contact details
- Personal data you provide if you subscribe to any of our mailing, newsletter services or forums
- Information about your use of our websites such as your IP address, which is a unique number identifying your computer, including personal data gathered using cookies

In addition we may obtain or ask you to provide certain specific data for appropriate use so that we

may conduct business within reasonable norms as required to fulfil commercial obligations to you or third parties.

By asking us to arrange or administer a contract, provide a service or undertake a business transaction, you confirm to us that in doing so you have the right and explicit permission from others to share appropriate personal information.

We may also collect information from publicly available sources and third party databases made available for the purposes of reducing fraud and financial crime as well as any other third party databases where your personal data may be held, provided such third parties have lawful bases on which to share such personal data with us.

### How we use your personal data and the lawful basis for processing

The following table applies where we are relying on a lawful basis for processing your personal data, other than the basis of consent. We may rely on one or more of the following lawful bases when processing your personal data for the following purposes:

Purpose for which we may process your personal data	The lawful basis on which we do this
To perform our contractual obligations to you. This would include meeting your requests for services	<b>Contract</b> The data processing is necessary for any contract you may enter into with us
To administer your account, including financial transactions for invoice and accounts payables	<b>Contract</b> The data processing is necessary for any contract you may enter into with us
To assist in the prevention and reduction of fraud and other financial crime	<b>Legal obligation</b> The data processing is necessary for us to comply with the law and the requirements of our regulator
To handle your claim against one of our clients	<b>Legitimate interests</b> The data processing is necessary to pursue our legitimate interest in fulfilling our contractual obligations with our clients, to protect our clients' interests and to conclude the claim to your satisfaction
In the interests of security and to improve our service, telephone calls you make to us may be monitored and/or recorded	<b>Legitimate interests</b> The data processing is necessary to pursue our legitimate interest in the management and operation of our business
To let you know about similar products and services that may be of interest to you	<b>Legitimate interests</b> The data processing is necessary to pursue our legitimate interest in the management and operation of our business

### Who we pass your personal data to

We may need to pass your personal data to other companies which may include:

- Other companies or brands within our group of companies
- Parties that we interact with for the legitimate purpose of fulfilling and administering our contractual and statutory obligations. This may also include third party providers subcontracted or associated with fulfilment of our duties and other third parties involved (directly or indirectly) in the administration of the services we provide and associated benefits
- Firms that provide administration, processing and operational services to us or on our behalf under contract such as IT systems support, administrative services and other activities set out in this privacy notice, as well as support activities such as finance and auditing services
- Organisations that have a specific role laid out in law, such as statutory bodies, regulatory authorities and other authorised bodies
- Other organisations where we have a duty to or are permitted to disclose your personal information by law, for example if we receive a valid request from the police or other third party organisation in the interest of preventing and detecting crime, fraud prevention agencies and operators of registers available to check information and prevent fraud

The personal information you share with us may be transferred by us or any of the types of firms or organisations we have noted above, to other countries in order for processing to take place, including locations outside of the UK and the European Union. In the unlikely event that we transfer your personal information outside the European Union we will ensure that an adequate level of protection is in place to protect your personal information such as putting in place contractual protections which have the purpose of ensuring the security of any information passed and putting in place technical and organisational security measures to prevent the loss or unauthorised access of your personal information.

### How we contact you about other products and services

We may from time to time process your personal data to let you know about similar products and services that may be of interest to you, or to keep you up to date on the latest industry news and/or risk management advice. This is because we value you as a client and are committed to providing you with the certainty necessary to help you manage the risks you face. Our lawful basis for processing your personal data in this way is as is necessary to pursue the legitimate interests of our business, unless we have otherwise obtained your consent to do so. We may contact you by post, telephone or e-mail. You will be given the option to stop receiving any communications from us in this regard at any time however please note that this will not affect us contacting you about the services that you have specifically requested from us.

### Accessing our website and cookies

When you visit one of our websites we may collect information from you, such as your email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of website traffic, such as who visits and why they visit. We use third parties to collate IP addresses to help us understand our Internet traffic data and data regarding your browser type and computer. We may also use web usage information to create statistical data regarding the use of our website. We may then use or disclose that statistical data to others for marketing and strategic development purposes, but no individuals will be identified in such statistical data.

We may use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website, but not on your computer. Pixel tags usually work together with cookies to help us to give you a more tailored service. We may also use cookies and pixel tags in our email communication to personalise the email and track whether the email has been opened and whether the recipient has used any website links contained in the email communication. This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

Internet browsers normally accept cookies by default, although it's possible to set a browser to reject cookies. Rejecting cookies may restrict your use of our website and/or delay or affect the way in which our website operates. The open nature of the internet is such that data may flow over networks without security measures, and may be accessed and used by people other than those for whom the data is intended. While this is outside of our control, we do take the protection of your information very seriously and aim to apply appropriate levels of security at all times.

We accept no responsibility for the privacy policies of any third party sites visitors can access through our website.

### Your Rights

We will only store your data for as long as is necessary to comply with the requirements of your contract(s) and any legal obligations or lawful processing conditions that may exist as a result. You have a number of rights concerning the personal information we use, which you may ask us to observe. In some cases even when you make a request concerning your personal information, we may not be required, or be able to carry out your request as this may result in us not being able to fulfil our legal and regulatory obligations under the lawful processing conditions under which we hold your data or because there is a minimum statutory period of time for which we have to keep your information. If this is the case we will let you know our reasons.

You can ask us to:

- › Provide a copy of your personal information
- › Correct or delete unnecessary or inaccurate personal information
- › Restrict or to object to the use of your personal information at any time
- › Provide your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller. This right only applies where our processing of your personal data is automated and the processing took place initially with your consent or for the performance of a contract with you
- › Where we rely on your consent to use your personal information, you can withdraw that consent at any time. Where your consent is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you don't want us to contact you again

### How to contact us

If you need to contact us in connection with the use or processing of your personal data, or you have any questions or concerns about this privacy notice or your data protection rights, you can get in touch with our data protection co-ordinator as follows: -

Ally Bath  
Data protection co-ordinator  
Sevatas  
Hyde Park House  
Crown Street,  
Ipswich,  
Suffolk IP1 3LG  
UK  
+44 (0) 1473 346046  
[info@poundgates.com](mailto:info@poundgates.com)

You also have the right to make an enquiry or to complain to the Information Commissioner's Office (ICO) if you are unhappy with our use of your data, or if you think we have breached a legal requirement. Further details about the ICO are available at: [www.ico.org.uk](http://www.ico.org.uk)