



## GDPR and Data Protection Compliance Statement

Nexus Vehicle Management Limited ('Nexus', 'we', 'our' or 'us') collects and Processes Personal Data in order to supply its services. This document sets out how Nexus, and its customers and suppliers Process Personal Data as either independent Controllers or Processors pursuant to the supply and receipt of Nexus' services.

The defined terms used in this document shall have the meaning set out in the Appendix.

This document represents our general Compliance Statement. Where and to the extent that the terms conflict with any data protection and security requirements set out in our agreement with you, the terms of the agreement shall prevail.

### Nexus as a Controller

1. Nexus Vehicle Processes Personal Data as an independent Controller where it receives a request from a customer for a hire vehicle, and upon receipt of such request, Processes the customer's Personal Data in order to source and facilitate the supply of a hire vehicle from a third-party supplier (**supplier**). Where Nexus Processes Personal Data as a Controller, it does so in accordance with its Privacy Policy.
2. In such instance, the customer is an independent Controller of the Personal Data it shares with Nexus for such purpose, and the supplier is an independent Controller of the Personal Data it receives and Processes pursuant to the same.

### Nexus as a Processor

3. In certain instances, Nexus Processes Personal Data as a Processor, including as follows:
  - i. where Nexus manages claims (including any claims, fines, offences, or penalties due or payable in relation to any hire vehicle) on behalf of a customer, and in doing so, Processes Personal Data for and on behalf of the customer. In such instance, the customer is the Controller of such Personal Data and the Processing of such data is subject to the privacy policy of the customer; and
  - ii. where Nexus manages MOTs for hire vehicles on behalf of a supplier, and in doing so, Processes Personal Data for and on behalf of the supplier. In such


instance, the supplier is the Controller of such Personal Data and the Processing of such data is subject to the privacy policy of the supplier.

## Protection of Personal Data

4. In order to supply its services, Nexus needs to share Personal Data with third-party suppliers, for example suppliers of hire vehicles. Where Nexus shares Personal Data with a third party, it does so in accordance with its Privacy Policy, and ensures that written terms are in place which reflect the requirements of the Data Protection Legislation for the protection and security of Personal Data.
5. Where Nexus Processes Personal Data as a Processor, it enters into written terms with the Controller of such Personal Data which reflect the requirements of Article 28 UK GDPR. For example, to cater for the duties and obligations of Nexus in the event of a Personal Data Breach or should a Data Subject wish to exercise their rights.
6. Nexus has implemented appropriate technical and organisational measures to safeguard Personal Data in accordance with the Data Protection Legislation, including by use of secure passwords, user access controls, encryption, technical security such as firewalls and physical security including alarms, secure locks and specific entry passes for authorised individuals. However, while Nexus uses reasonable efforts to safeguard Personal Data, the use of the internet is not entirely secure and for this reason, Nexus cannot guarantee the security or integrity of any Personal Data that is transferred from or to Nexus via the internet.
7. Nexus requires that its employees and representatives undergo a reasonable level of training regarding the handling of Personal Data, appropriate to the type of Personal Data being Processed. As part of its commitment to the protection of Personal Data, Nexus ensures that it enters into written agreements that ensure that its suppliers take the same steps in relation to their employees or representatives for the protection and security of Personal Data.

## Retention Periods

8. Nexus stores Personal Data for differing periods of time, depending on the type of Personal Data, and in particular as follows:
  - a. Customer Personal Data for 6 years from the date on which you cease to be a customer of ours;
  - b. Supplier Personal Data for 6 years from the end of our commercial relationship; or until the customer or supplier (as applicable) asks us to return or delete it, unless the law requires us to store the data for a longer period.

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- c. Personal Data supplied by a customer on behalf of its client(s) in relation to the provision of services until:
    - i. the services have been provided for in accordance with the relevant contract; or
    - ii. the customer or the Data Subject asks us to delete it; in each case, unless the law requires us to store the data for a longer period.

9. Nexus carries out regular audits of the Personal Data it holds to ensure as far as possible that we do not hold any Personal Data that is no longer required.

### International Transfers

10. We will only send Personal Data outside of the UK where this is required as part of the services and we have entered into an agreement with the relevant supplier (who is located outside of the UK) in accordance with the Data Protection Legislation.

### Contact Us

11. Any questions about this statement or how Nexus Processes, uses or stores Personal Data should be addressed to our Data Protection Officer: Ryan Robinson at our registered office or at [GDPR@nexusrental.co.uk](mailto:GDPR@nexusrental.co.uk).

### Changes to this Compliance Statement

12. We may change this statement from time to time to comply with the Data Protection Legislation. In this event we will contact you in writing to provide you with updated details.

Signed,  
Alex Cook  
CFO



Dated 28 November 2024

## Appendix

In this document, the following terms shall have the following meaning:

**Data Protection Legislation** means the laws in the United Kingdom relating to the processing or protection of personal data and privacy and all laws implementing them, including: (i) the UK General Data Protection Regulation (as defined by section 3(10)(as supplemented by section 205(4) in the Data Protection Act 2018) and part of the UK domestic law by virtue of section 3 of the European Union (Withdrawal) Act 2018) ("**UK GDPR**"); (ii) the Data Protection Act 2018 ("**DPA**"); (iii) the Privacy and Electronic Communications (EC Directive) Regulations 2003 ("**PECR**"); and (vi) any amending, replacement, or superseding legislation of any of the above from time to time, together with all applicable codes of practice, policies, measures or publications of the relevant supervisory authority from time to time;

**Controller, Processor, Data Subject, Personal Data, Personal Data Breach, Processing** and appropriate technical and organisational measures: as defined in the Data Protection Legislation.