

Privacy Policy

This website www.nexusrental.co.uk (our **Website**) is operated by Nexus Vehicle Management Limited (**Nexus, we, us, our**). For the purpose of Data Protection Laws, we are the controller of the personal data processed for the purposes set out below and we are responsible for looking after it. Our registered office is located at Nexus House, Richardshaw Lane, Stanningley, Pudsey, West Yorkshire, LS28 6AA, United Kingdom.

We are committed to ensuring that your privacy is protected and that we comply with all applicable data protection rules (including applicable marketing and cookies laws, together with associated guidance) (the "**Data Protection Laws**").

This policy sets out how Nexus processes and protects your personal data when you use our Website, purchase or enquire about our services, create an account on our Website, or otherwise contact us and explains how we collect, use, store and share the personal information we collect about you, how you can exercise your rights in respect of that information and the procedures that we have in place to safeguard your privacy.

When we refer to "processing" in this policy, we mean any activity concerning your personal data, including collecting, using, disclosing, deleting and anonymising.

Please note: this policy relates to the processing of personal data where we are the controller, and providing our services, this includes processing personal data in order to source and facilitate the hire of a vehicle. However, our service operates as a marketplace to source vehicle hire and services. In providing our services, therefore, we may share your data with third party vehicle hire suppliers who will operate as independent controllers and will process your personal data in accordance with their own privacy policies, see Disclosures of your Personal Data section below.

This policy also does not cover third party websites that we may link to from our Website, unless specifically mentioned in this policy. We are not responsible for the privacy policies and practices (including use of cookies) of such third parties even, in the case of third party websites, if you accessed the third party website using links from our Website. We recommend that you check the policy of each third party supplier and website you visit and contact the owner or operator of such website if you have concerns or questions.

Our Website and services are not intended for children and we do not knowingly collect data relating to children.

Types of personal data we collect about you

Personal data is any information which identifies someone or which relates to someone. The types of personal data that we may collect, use, store and transfer about you, include:

- **Identity Data**, including your first name, surname, title, date of birth, gender, driving licence, insurance information, passport, and proof of residence;
- **Contact Data**, including your postal address, phone number, email address;
- **Technical Data**, including your IP address, login data, browser type and versions, operating system and platform, device ID and other technology on the devices you use to access our Website;
- **Profile Data**, including your username and password, when you create an account on Iris via our Website;
- **Financial Data** including bank account and payment card details;
- **Usage Data**, including information about how you interact with our Website;
- **Marketing and Communications Data**, including your preferences to receive marketing from us and your communication preferences; and
- **Special Category Data**, including health and disability data, indirectly collected by virtue of the hire of certain vehicles which are designed for disability or mobility purposes.

How your personal data is collected

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

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - enquire regarding our services;
 - create an account on Iris via our Website;
 - purchase our services;
 - visit us or engage with us on social media; or
 - provide feedback or otherwise contact us.
- **Automated technologies or interactions.** As you interact with our Website, we will 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 will receive personal data about you from various third parties and sources, including where your information is provided by:
 - your employer, your insurer, or other third party who has a contractual relationship with you;
 - third parties who provide your information as emergency contact details;
 - CCTV or dashcam footage;

- o Where you provide information relating to someone else you must ensure that you have the necessary rights under Data Protection Laws to share that data with us, and you undertake to ensure that this privacy policy has been brought to the attention of the individual whose data you have shared with us.

How we use your personal data

The law requires us to have a lawful basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you;
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law);
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis;
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

We have set out below a description of the all the ways in which we shall use the various categories of your personal data, and which of the legal bases we rely on to do so.

PURPOSE/USE	TYPE OF DATA	LEGAL BASIS
<p>To register your account on Iris via our Website and supply our services to you, including:</p> <p>a) reserving, and facilitating the hire and lease of, a vehicle from a third-party rental vehicle supplier;</p> <p>b) fleet management services; and</p>	<p>a) Identity Data; b) Contact Data; c) Profile Data; d) Information; and e) Special Category Data.</p>	<p>a) Performance of a contract with you; b) Where we process Special Category Data, we do this on the basis of your consent.</p>



c) vehicle breakdown services.

To process your purchase of our services, including:

- a) managing payments, deposits, fees and charges; and
- b) collecting and recovering money owed to us.

To manage our relationship with you which will include:

- a) notifying you about any important information regarding the hire vehicle;
- b) notifying you about changes to our terms and conditions, this Privacy Policy or our rental management platform (Iris);
- c) notifying you about any specific changes to your contract or any general updates regarding our business or changes in our processes or any legislation that may affect our services; and
- d) dealing with your requests, complaints and queries.

To administer and protect our business and our Website (including, the detection and prevention of fraud, troubleshooting, data analysis, testing,

- a) Identity Data;
- b) Contact Data;
- c) Financial Data; and
- d) Marketing and Communications.

- a) Identity Data;
- b) Contact Data;
- c) Profile;
- d) Marketing and Communications; and
- e) Special Category Data.

- a) Identity Data;
- b) Contact Data; and
- c) Technical Data

- a) Performance of a contract with you;
- b) Necessary for our legitimate interests (to recover debts due to us).

- a) Performance of a contract with you;
- b) Necessary to comply with a legal obligation;
- c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you);
- d) Where we process Special Category Data, we do this on the basis of your **consent**.

- a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network



system maintenance, support, reporting and hosting of data).

security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise);

- b) Necessary to comply with a legal obligation;
- c) Where we collect any data via cookies we do this on the basis of your **consent**, or in the case of Essential Cookies on the basis of our **legitimate interest** to operate the site and ensure its security.

To use data analytics to improve and customise our Website and services, customer relationships and experiences and to measure the effectiveness of our communications and marketing.

- a) Technical Data; and
- b) Usage Data.

- a) Necessary for our legitimate interests (to define types of customers for our services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy);
- b) Where we collect any data via cookies we do this on the basis of your **consent**, or in the case of Essential Cookies on the basis of our **legitimate interest** to operate the site and ensure its security.

To send you relevant marketing communications and make personalised suggestions and recommendations to

- a) Identity Data;
- b) Contact Data;
- c) Technical Data;
- d) Usage Data;
- e) Profile; and

- a) Necessary for our legitimate interests (to carry out direct marketing, develop our services and grow our business);



you about our services that may be of interest to you.

f) Marketing and Communications

b) Consent, having obtained your prior consent to receiving direct marketing communications;

c) Where we collect any data via cookies we do this on the basis of your **consent**, or in the case of Essential Cookies on the basis of our **legitimate interest**.to operate the site and ensure its security.

Marketing and Promotional Materials

We may use your information to provide you with marketing and promotional materials (as stated above).

In such instances, we will use your information to deliver promotional information that you have requested, or that we feel may interest you (unless you have previously told us that you do not wish to receive marketing communications from us).


The personalisation of advertisements displayed on social media platforms may be based on information you have provided directly to us (for example when browsing our Website or purchasing our products) or based on other information attributed to you via cookies, including cookies set by third parties.

You may opt-out of receiving marketing and promotional materials from us at any time by emailing us at GDPR@nexusrental.co.uk or using the 'unsubscribe' link in the marketing or promotional email.

Disclosures of your personal data

We will share your personal data where necessary with the parties set out below and for the purposes set out in the table above. We will share your personal data with:

- third party suppliers of rental and hire vehicles, in order to facilitate the hire and lease of a vehicle to you. In supplying our services, Nexus operates as a marketplace to source vehicle hire, and in doing so, may share your personal data with a third-party vehicle rental company who shall use your personal data for their own purposes, including supplying and delivering the rental vehicle to you, and Nexus has no control over such use of your personal data. You should read the



privacy notice of the third-party rental vehicle supplier for further information as to how they use your personal data;

- other companies within the Nexus group of companies;
- driving bodies and agencies including (but not limited to) DVLA, local councils, the police, the Government, and any other traffic or vehicle body or regulator;
- our professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations; and
- 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.

International Transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside of the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK. To obtain a copy of these contractual safeguards, please contact us using the details below (see, Contact Us, below).

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.

Use of Cookies

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and allows us to improve our Website.



A cookie is a small text file which is generated by a website and stored onto your computer (or other electronic device) when you use our Website. Cookies allows our Website to communicate with your browser or hard drive and allows us to present certain website functionality to you, remember your preferences and carry out other functions, detailed below.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

COOKIES WE USE	PURPOSE	DURATION	DATA STORED
SERVERID	Functional. This cookie is used for load balancing purposes, to help facilitate the distribution of website traffic across multiple servers and maintain performance of our Website.	Session. This cookie is deleted when you close your browser.	This cookie does not contain personal data. The cookie creates a unique 'identifier'.
PHPSESSID	Functional. To provide functions across pages of our Website by recording your visit to our Website, the pages you have visited and the links you have followed.	Session. This cookie is deleted when you close your browser.	This cookie assigns a unique session ID and associates it with your session data stored on your server.

The cookies listed in the table above will not be accessed by any third party.

We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide our Website. You can withdraw any consent to the use of cookies or manage any other cookie by adjusting your settings in your browser. however, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website.

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

Data Retention

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

data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In particular, we store personal data as follows:

- customer or supplier personal data – 6 years from the date of the end of our contract with you; or
- until you ask us to delete it;


in each case unless the law requires us to, or we have a legitimate reason to, store the data for a longer period.

We carry out regular audits of any personal data we hold to ensure as far as possible that we do not hold any personal data that is no longer required.

Your rights

You have a number of rights under data protection laws in relation to your personal data. You have the right to:

- **request access** to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **request correction** (rectification) of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- **request erasure** of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- **request the restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - where you want us to establish the data's accuracy;

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- where our use of your personal data is unlawful but you do not want us to erase it;
 - where you need us to hold your personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - where you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.
- **request the transfer** of your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, machine-readable format. Please note this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
 - **object** to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your personal data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
 - **automated decision making** you have a right not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you. **We do not carry out any automated processing or profiling.**

If you wish to exercise any of these rights, please contact us using the contact details below (see, **Contact Us**).

Contact Us

If you wish to contact us about your rights or have any questions about this Privacy Policy or the information we hold about you, please contact our data manager: Ryan Robinson at GDPR@nexusrental.co.uk.

Right to lodge a complaint

If you have any concerns or complaints about how we use your personal data, we would appreciate the chance to deal with your concerns in the first instance, and we hope that you will alert us to these directly (see Contact Us, above). In any event, you are entitled to complain to the Information Commissioners Office (ICO) which is the supervisory authority in the UK. Their contact details and the procedure can be found at www.ico.org.uk.

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

We may change this Privacy Policy from time to time. You should check this Privacy Policy occasionally to ensure you are aware of the most recent version that will apply each time you access our Website or use our services.

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, for example should your postal or email address change.

This privacy policy was last updated in June 2024.