



## Privacy policy

### 1. INTRODUCTION

We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information and any data you may provide when you use services or contact us. This website is not intended for children and we do not knowingly collect data relating to children. This privacy policy does not apply to services offered by other companies or individuals, including products or sites they offer that may include Pinpointers branded services. Please review the privacy notices of such companies.

### 2. WHO WE ARE

We are SBS Solutions Limited a company registered in England and Wales with company number of 04311316. Our trading name is Pinpointers. Pinpointers is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

### 3. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

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

**Identity Data** includes (first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender).

**Contact Data** includes (billing address, delivery address, email address and telephone numbers).

**Financial Data** includes (bank account and payment card details).

**Transaction Data** includes (details about payments to and from you and other details of products and services you have purchased from us).

**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, device ID and other technology on the devices you use to access this website).

**Profile Data** includes (your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses).



**Usage Data** includes (information about how you interact with and use our website, products and services).

**Communications Data** includes your preferences in receiving communications from us.

**Location Data** includes the tracking of a location using GPS which may comprise personal data if linked to a vehicle identified as being driven by you.

**Image and Audio data** includes images of you and sound (if enabled) recorded by our on-board devices (dashcams) in vehicles.

We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

#### **4. HOW IS YOUR PERSONAL DATA 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:

- request information/demonstrations in respect of our products or services;
- create an account on our website; or
- give us feedback or 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 and other similar technologies. See below.

**Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

*Technical Data* is collected from analytics providers (such as Google based outside the UK);



*Contact, Financial and Transaction Data* is collected from providers of technical, payment and delivery services (such as First Capital Cashflow based inside the UK).

*Identity and Contact Data* may be collected from publicly available sources (such as Companies House and the Electoral Register based inside the UK).

*Contact, Financial and Identity data* may be collected by our agents, resellers and distributors and passed to us to monitor performance of such third parties under the agreements we have with them.

## 5. HOW WE USE YOUR PERSONAL DATA

### Legal basis

The law requires us to have a legal 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, for example if you subscribe to an email newsletter.

### 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 the various categories of 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.

Purpose/Use	Type of data	Legal basis
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To provide our services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Communications (f) Location (g) Image and Audio	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us or to provide our tracking services)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Communications	(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 including advising you of how to use products and similar products that may be of use)
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) Necessary 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 re-organisation or group restructuring exercise) (b) Necessary to comply with a legal obligation



To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications	(a) Technical (b) Usage	Necessary 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)
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## 6. DISCLOSING PERSONAL INFORMATION

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

Internal Third Parties (as defined below)

External Third Parties (as defined below)

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.

**Internal third parties** are other companies affiliated with our group, as acting as joint controllers or processors and providing HR and system administration services from time to time.

**External third parties** are:

- Service providers acting as processors based who provide IT and system administration services. For instance, our financial transactions are handled through our payment services provider, First Capital Cashflow. You can review the provider's privacy policy at <http://www.firstcapitalcashflow.com/about-us/privacy-policy/>.



- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Public authorities acting as processors or joint controllers. Pinpointers may be required to disclose personal data following lawful requests from public authorities, with respect to meeting national security or law enforcement requirements.
- Camera images and audio (if enabled) may be used as evidence against fraudulent insurance claims, and to provide the police with assistance to detect, deter and prevent crime or to help identify offenders. The footage that is collected in our devices may be used as evidence in criminal or civil proceedings and shared with the relevant court, authorities and their advisers. Our devices facilitate this function but you should refer to data controller and their own privacy notices/policies which will apply to how such data is used or shared.

## **7. INTERNATIONAL DATA TRANSFERS**

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy. At present, we store your information in the European Economic Area (EEA) and the UK.

## **8. RETAINING PERSONAL INFORMATION**

- 8.1 This Section 8 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 8.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 8.3 Notwithstanding the other provisions of this section 8, we will retain documents (including electronic documents) containing personal data:
- (a) to the extent that we are required to do so by law;
  - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).



- 8.4 In some circumstances you can ask us to delete your data: see below *Your Rights* for further information.

## **9. SECURITY OF PERSONAL INFORMATION**

- 9.1 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.
- 9.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 9.3 All electronic financial transactions entered into through our website will be protected by encryption technology.
- 9.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 9.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

## **10. AMENDMENTS**

- 10.1 We may update this policy from time to time by publishing a new version on our website.
- 10.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 10.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

## **11. YOUR RIGHTS**

- 11.1 You have a number of rights under data protection laws in relation to your personal data.
- 11.2 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 of the personal data that 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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to 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 data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING Error! Reference source not found.** in paragraph 5 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that 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.
- Request 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:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us see Contact details below.





## **12. NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## **13. WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **14. TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **15. CONTACT DETAILS**

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us by emailing [support@pinpointers.com](mailto:support@pinpointers.com).

## **16. COMPLAINTS**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **17. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our privacy policy under regular review. 1 February 2024.

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 a new address or email address.

## **18. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect



or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

In addition, your device's operating system, other apps running on your device or the communication networks collect, may transmit and store your personal and location information. We are not involved in this and have no influence over this. Please adjust your settings from your mobile operator, third party device manufacturer and other app developers.

## **COOKIE POLICY**

- 18.1 Our website uses cookies.
- 18.2 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 18.3 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 18.4 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.
- 18.5 We use both session and persistent cookies on our website.
- 18.6 We use 'Session' and 'ppMobiSession' to validate authenticated users sessions.
- 1.1 Most browsers allow you to refuse to accept cookies; for example:
  - (a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
  - (b) in Firefox (version 47) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
  - (c) in Chrome (version 52), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.



- 18.7 Blocking all cookies will have a negative impact upon the usability of many websites.
- 18.8 If you block cookies, you will not be able to use all the features on our website.
- 18.9 You can delete cookies already stored on your computer; for example:
- (d) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);
  - (e) in Firefox (version 47), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
  - (f) in Chrome (version 52), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".
- 18.10 Deleting cookies will have a negative impact on the usability of many website.

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