

## GDPR and Data Protection Compliance Statement

This document sets out how we protect the Personal Data and Special Category Data (each as defined in Appendix A) that we process when we supply services to our customers. This document also sets out the standards we require from our suppliers who may access Personal Data. "Personal Data" has the meaning as set out in the Legislation (as defined below) but put simply, it means any data that identifies a person (e.g. name, address, email address, mobile number).

We take the privacy of the Personal Data which we handle very seriously.

1. Adapted Vehicle Hire Limited ('AVH', 'we', 'our' or 'us') are a 'Data Processor' for the purposes of the Data Protection Act 1998 and as of 25 May 2018, the General Data Protection Regulation ('GDPR') (as applicable the "Legislation"). We will take all appropriate steps to ensure compliance with the Legislation.
2. We only process the Personal Data and Special Category Personal Data which we need in order to provide our services. Details of the types of Personal Data and Special Category Data which we and our suppliers process are set out in Appendix A.
3. We only sub-contract our services to third party suppliers who contract in writing with us and agree to be bound by the terms of this statement. (In providing our services our suppliers are also 'Data Processors' as defined in the Legislation.)
4. In the provision of our services we process Personal Data on behalf of our customers and/or their clients who are the 'Data Controllers' (as defined by the Legislation). We will only process Personal Data as stipulated in any agreement with you, our customers or further to your written instructions. Our suppliers only process Personal Data in accordance with our written instructions.
5. We keep all Personal Data confidential and secure and we have incorporated the necessary technical and organisational measures to safeguard any Personal Data processed by us, in accordance with the Legislation, which for information includes the 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 we will use all reasonable efforts to safeguard your Personal Data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Personal Data that is transferred from you or to you (further to your instructions) via the internet.
6. We will report any breaches or potential breaches to you as soon as we become aware of them (in any event within 24 hours) and we will provide sufficient information as is required for you to decide on how to handle the breach and to report such a breach to the relevant supervisory authority, if necessary. If you so request we will ensure that any further processing ceases.
7. We record the processing activities undertaken on your behalf and will provide you or your authorised representatives with access to the relevant records and premises on reasonable notice, during office hours for the purpose of carrying out an audit to ensure compliance with the Legislation in the supply of the agreed services.
8. We will promptly inform you of any request made by a regulator or data subject and we will comply with such requests subject to your prior written approval (unless we are legally prevented from obtaining such approval) and the payment of our reasonable costs in so doing.
9. We may send Personal Data to our suppliers in order to provide the services to you. If we need to send any Personal Data to any other third party then we will obtain your prior written consent before

doing so, unless we are required by law to take such an action, in which case we will promptly inform you as soon as we are permitted to do so.

10. We take reasonable steps to ensure the reliability and integrity of our employees or representatives who may have access to any Personal Data which they process on our behalf. We require such employees and representatives to undergo a reasonable level of training regarding the handling of Personal Data, appropriate to the type of Personal Data being processed to ensure they comply with the Legislation and they are subject to confidentiality obligations. We will also procure that our suppliers take the same steps in relation to their employees or representatives.
11. Retention Periods: We store Personal Data on secure servers for differing periods depending on the type of Personal Data and in particular as follows:
  - customer contact data for 6 years from the date on which you cease to be a customer of ours
  - supplier contact data for 6 years from the end of our commercial relationship  
OR until the customer or supplier asks us to return or destroy it
  - Personal Data supplied by a customer on behalf of its client(s) in relation to the provision of services until:
    - the services have been provided or in accordance with any contract for the supply of services; or
    - you or the data subject asks us to destroy it

in each case unless the law requires us 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.

12. We will only send Personal Data outside the EEA where this is required as part of the services and we have entered into a legal agreement with such supplier (who is outside the EEA) to safeguard data subjects in accordance with the Legislation.
13. Any questions about this statement or how we handle your Personal Data should be addressed to our data manager: Mike Palmer at our registered office or at [gpr@nexusrental.co.uk](mailto:gpr@nexusrental.co.uk).

### Changes to this Compliance Statement

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



Signed by:

**John Ellis**

Managing Director

for and on behalf of **ADAPTED VEHICLE HIRE LIMITED**

## APPENDIX A

### PART 1 - TYPES OF PERSONAL DATA

Customer, rental users and supplier business contact details including names, email, postal addresses and telephone numbers.

We do not process any sensitive (special category) Personal Data.

Our Suppliers will handle Customer and rental user contact details including email and postal addresses, telephone numbers and driving licence information of rental users.

### PART 2 – PROCESSING ACTIVITIES THAT WE UNDERTAKE IN RELATION TO PERSONAL DATA

We process Personal Data to:

- identify you and manage any accounts you hold with us;
- provide the services requested;
- let you know about any changes to our products or services or about other products or services that may be of interest to you
- detect and prevent fraud;
- notify you of any changes specific to your contract or any general updates regarding our business or changes in our processes or any legislation that may affect our services; and
- improve our services.