

## INTRODUCTION

This privacy policy sets out how we deal with any personal data we collect from you while you are:

using our website;

using our apps on a phone or other device; or

discussing or receiving services from us.

This policy was last updated January 2020.

## WHO ARE WE

We are Global Telemetrics Limited (Company Number 6965076). We trade as "Global Telemetrics" or "SmarTrack". We operate the website <http://www.globaltelemetrics.com> (our "Site"). We also provide mobile apps related to our services (our "App(s)"). Our registered office and main trading address is 63 Fosse Way, Syston, Leicestershire, LE7 1NF. Our VAT number is 119 848 871.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

Geo-location data regarding any vehicles which you have subscribed to our services.

More details on what Geo-location data is can be found in the section below.

Geo-location data provided by any phone or other device on which you use our App(s).

Information that you provide by filling in forms on our Site or App(s). This includes information provided at the time of registering to use our Site or App(s), subscribing to our service, posting material on our Site or App(s) or requesting further services.

Information that you provide when you contact us. In particular, telephone calls that you make to us may be recorded.

Details of transactions you carry out with us (through our Site, App(s) or otherwise) and of the fulfilment of your orders.

Information in relation to any "D-iD™" device or App which you use in conjunction with the tracking services we provide. Details of how we use such information can be found in our specific "D-iD™ Privacy Statement" at [www.globaltelemetrics.com/terms](http://www.globaltelemetrics.com/terms), which takes priority over this more general Customer Privacy Policy.

### Geo-location Data

Geo-location data is a record of where a vehicle, phone, or other device is at any given moment.

Geo-location data can also relate to the acceleration experienced by that vehicle, phone or other device.

If Geo-location data is gathered for a period of time it can be used to show where that vehicle, phone or other device has been, the direction it was travelling and the time when it made those journeys.

Geo-location data may be recorded when your tracking system is activated or you use our App(s) on your phone or other device.

If your tracking system is properly installed, and has not been tampered with, we are able to activate and deactivate the tracking system remotely. The tracking system will be activated whenever our agreement with you obliges or allows us to try and track a vehicle; this is typically done either to test the correct operation of the tracking system or when you, the police or your insurance company contact us to report that the vehicle has been stolen.

Geo-location data on your vehicle will no longer be recorded when the tracking system is deactivated. You may request for the tracking system to be deactivated in this way by contacting us using the details in the "Contact" section below.

Geo-location data is key to our services. As such, if you refuse to allow us to gather Geo-location data or request that the system be deactivated we will be unable to provide you with those services.

### IP Addresses and other Technical Data

We may collect information about your computer, phone or other device, including where available your IP address, device identification information, operating system and browser type information, for system administration and to report aggregate information to our advertisers.

## USES MADE OF YOUR INFORMATION

We use the data held about you in the following ways:

to assist with the installation, repair or replacement of tracking systems;

to track the location of and acceleration experienced by vehicles which you have subscribed to our services. In particular, to allow you to view the movements of your vehicle when the system has been activated;

to make Geo-location data from the previous six (6) months available through your account on our Site and App(s);

to keep an archived record of Geo-location data which is more than six (6) months old. Archived data will be provided to you within twenty eight (28) working days of a written request;

to track the location of your phone or other device using our App(s) so we can, for example, direct you to your vehicle;

to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;

to carry out our obligations arising from any contracts entered into between you and us (in particular, contacting you in respect of Recovery and "First Notice of Loss" Services);

to prevent fraud;

to comply with our legal and regulatory obligations; and/or

to notify you about changes to our services.

We use your data in these ways either to perform contracts we have (or may soon have) with you, to pursue our legitimate interests of managing, developing and marketing our business, where we have your consent to do so or where we have to do so to comply with our legal and regulatory obligations. Further details of these basis for processing can be provided on request.

## MARKETING COMMUNICATIONS

We may use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you by e-mail, post or telephone.

We will provide check boxes which you can use to let us know if you do not wish us to contact you in this way on the forms, Site or App(s) through which we collect your data.

In addition, you have the right to ask us not to process your personal data for marketing purposes at any time. You can exercise this right by contacting us using the details in the "Contact" section below or selecting the "Unsubscribe" link in any relevant marketing e-mail.

## FURTHER DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group of companies. This means our subsidiaries, our ultimate holding company and the subsidiaries of that holding company.

We may disclose your personal information, and in particular the Geo-location data, to third parties in the following circumstances:

To any Global Telemetrics approved installation, service company or dealer who we work with to install, repair or replace your tracking system(s).

To aid with Police investigations. For example, we may provide the Police with Geo-location data regarding a vehicle which has been reported as stolen or recordings of telephone calls you have made to us.

To aid with the proper administration of insurance claims or applications. For example, your ability to provide Geo-location data may be used to gain PAYD (pay as you drive) insurance. Should this be the case you agree to us making reasonable disclosure of that Geo-location data to your insurance company in respect of such insurance.

To mailing or printing agents, contractors and advisors that provide a service to us.

For research purposes, for example to analyse the Geo-location data to examine if there are any trends or patterns to how a vehicle is used once it has been stolen.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, our terms and conditions of supply and other agreements, or to protect the rights, property, or safety of Global Telemetrics Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

To anyone we may transfer our rights and duties under any agreement we have with you.

If Global Telemetrics Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the assets transferred to that third-party.

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

## WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password as part of our services, you are responsible for keeping this password confidential.

We ask you not to share a password with anyone.

## DATA SECURITY

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. However, please note that the transmission of information via the internet is unfortunately not completely secure.

As such, while we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site or App(s); any transmission is at your own risk.

## RETENTION

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

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 requirements.

By law we have to keep certain information for in excess of six years. This may, for example, be needed for tax purposes or for the prevention of crime. We typically retain this information for a further twelve months to ensure that no relevant claim has been made within that period before we dispose of it.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## COOKIES

We may obtain information about your general usage of our Site and App(s) by using a cookie file which is stored on your browser or the hard drive of your device. Cookies contain information that is transferred to your device's hard drive. They help us to improve our Site and App(s) and to deliver a better and more personalised service.

Some of the cookies we use are essential for our Site and App(s) to operate. If you register with us or if you continue to use our Site and App(s), you agree to our use of cookies. Cookies are widely used in order to make websites and App(s) work, or work more efficiently, as well as to provide information to the owners of the Site and App(s).

Examples of purposes for which a cookie may be used:

to estimate our audience size and usage pattern;

to store information about your preferences, and so allow us to customise our Site and App(s) and to provide you with offers that are targeted at your individual interests;

to speed up your searches;

to recognise you when you return to our Site and App(s); and/or

to allow you to use our Site and App(s) in a way that makes your browsing experience more convenient, for example, by allowing you to store items in an electronic shopping basket between visits. If you register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.

## DATA PROTECTION AND ACCESS TO YOUR INFORMATION

Global Telemetrics Limited is the data controller for the purpose of the General Data Protection Regulation (the "GDPR").

Under certain circumstances, the GDPR gives you the right to:

Request access to your personal data (commonly known as a "data 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.

Request erasure of your personal data. 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 exercised your right to object to processing (see below).

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.

Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal data to another party.

## CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on our Site and App(s) and, where we think it is appropriate, notified to you by e-mail.

## CONTACT

If you have any questions about this Privacy Policy, want to exercise your legal rights in respect of your personal data, want to withdraw your consent to a form of processing, have concerns about the treatment of your personal data, or wish to make a complaint about that treatment, please contact us:

by e-mail to [customerservices@globaltelemetrics.com](mailto:customerservices@globaltelemetrics.com); or

by post to Global Telemetrics Limited, Telemetrics House, Old Station Close, Coalville, Leicestershire LE67 3FH.

Our Data Protection Officer can be contacted directly by emailing [terms@globaltelemetrics.com](mailto:terms@globaltelemetrics.com)

You always have the right to make a complaint to the Information Commissioner's Office ("ICO") if you think your data is being misused. The ICO is the UK's supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

We always appreciate the chance to try to deal with concerns before they are referred to the ICO so, if you are happy to do so, please do not hesitate to contact us using the details above so that we can try to help you out in the first instance.