



## **We Do Rentals Privacy Policy**

### **Introduction**

At We Do Rentals Ltd, we are committed to protecting our customer's privacy and their personal information. We have updated our privacy policy to ensure we meet new requirements outlined by the GDPR (General Data Protection Regulations). This privacy policy governs the processes around the data we collect about you, how it is obtained, what it will be used for and who will access it. This privacy notice applies to our customers who are individuals and corporate businesses.

This Privacy notice should be read in conjunction with our terms and conditions of hire/contract with you.

### **Data Controller**

We Do Rentals Ltd as a data controller is dedicated to ensuring that all personal information is processed in line with the General Data Protection Regulations (GDPR).

Contact details for the Data Controller are:

Data Protection  
We Do Rentals Ltd  
Unit 202-204 SBDC  
Oldbury Road  
Smethwick  
B66 1NN

[dataprotection@wedorentals.co.uk](mailto:dataprotection@wedorentals.co.uk)

### **A) Reasons for collecting and processing personal information**

We Do Rentals Ltd needs to process your personal information to enable us to operate our vehicle hire business and provide you with a vehicle hire rental service. By accepting our Terms and Conditions of hire you are confirming that you have read and understood this policy, including how and why we use your information. If you do not want us to collect or process your personal information in the ways described in this policy then we cannot fulfil our contractual obligations and may have to terminate our agreement with you.

## **B) Types of personal information processed**

This privacy policy applies to the information held about you that can be used to identify you as an individual, known as personal information. The personal information processed by We Do Rentals Ltd includes, but is not limited to, the following:

- Your name
- Date of birth
- Addresses
- Telephone numbers
- Email address
- Credit card or other billing information
- National Insurance number
- Next of kin/emergency contact details
- Previous offence and convictions
- Previous accidents
- Proof of address/identity
- Visual images/footage captured in CCTV at our sites or those fitted to our vehicles.
- Telematics data

By providing personal information to We Do Rentals Ltd and using our vehicle hire services, you acknowledge that you understand and agree to the terms of this privacy policy and the subsequent processing of your personal information in accordance with this policy.

Where we need to collect personal data from you under the ongoing terms of contract that we have with you, or as required by law, and you fail/refuse to provide this data when requested, we may not be able to fulfil our contractual and insurance obligations and may have to cancel our contract with you.

### **IP Address**

We collect your IP address when you visit our website, this will only identify your internet service provider and does not contain any personal information about you as an individual. This information is solely used to allow us to understand where our site traffic originates to prevent any unauthorised access.

### **Use of Cookies**

What do we use cookies for?

Cookies enable us to customise our website and offerings to your



needs and provide you with a better online experience. In addition, cookies are used to measure usage of various pages on our website to help us make our information more pertinent to your needs and easy for you to access. The types of cookies that we use are referred to as "session" cookies and "persistent" cookies.

There are other types of cookies that track your browser/device across websites you visit but we do not use these. To learn more about cookies and how to manage them please visit [www.aboutcookies.org](http://www.aboutcookies.org).

### CCTV, Telematics and Vehicle Immobilisation

Our vehicles are equipped with CCTV, telematics and immobilisation technology that if a customer chooses book our vehicle hire services, accepts the terms of use as stated in the Terms and Conditions. These devices store certain information including monitoring and tracking any routes or destinations of all We Do Rentals vehicles. CCTV devices (which can include audio recording from inside the vehicle) may be used for the purposes of driver behaviour monitoring, insurances purposes, incident tracking, any other legal reason where we are required to do so by law.

Customers of We Do Rentals Ltd accept at the point of agreeing to Terms and Conditions that the vehicles are equipped with immobilisation technology in addition to any security devices fitted by the supplier of the vehicle or the manufacturer. This additional security measure may be used to help secure/immobilise vehicles during incidents of theft, unauthorised drivers, non-payment of rent and or any invoices outstanding

If customers require any clarification on the collection and use of such data then they should speak to a We Do Rentals representative at the branch.

### **C) Collection of your Personal Information**

We collect personal data from you directly when you book vehicle rental services from We Do Rentals. We may also obtain personal data about you from various third parties and public sources including credit reference and fraud prevention agencies, who may provide information about your financial or business trading history. If you are an individual customer we may also obtain personal data via your Contractor as named in the Indemnity Agreement.

We will require the above personal data at various stages. This allows We Do Rentals to process your booking, apply for adequate insurance cover,



to contact you if we have any problems with your request or to send you an electronic confirmation of the booking and billing.

To enable the booking to take place We Do Rentals Ltd will ask for copies of identification which can include a passport, driver's license, utility bill or a credit card statement. This information will be retained on file for the purpose of that rental agreement and for the applying for insurance cover. These documents will be securely disposed of when no longer needed.

Billing and payment information will be required to confirm a booking and for us to continue to provide a vehicle hire service to you. We will need to store billing and credit card information in the accounting system and Card Authorisation Form including the long card number and expiration date and CVV number for billing and default payment purposes.

#### **D) How we use your information**

Your personal information will only be used for the specific purpose that the information was collected for, if your information is to be used for any other purpose other than what it was originally intended then We Do Rentals will always gain explicit consent from its customers beforehand. Your personal information will only be kept for the period that it is required, once that time has elapsed your information will be securely deleted/disposed of- Please see further detail at section ....

We use information collected for, but not limited to, the following purposes:

- To create a registered customer account;
- To make your rental reservation;
- Assist in the transaction to secure your vehicle rental;
- To confirm and verify your identity for fraud prevention;
- To provide customer service in relation to your rental, vehicle maintenance and servicing,
- To contact you about a accidents, insurance claims, parking and penalty notices during your rental period,
- To bill and collect any amounts owed in connection with your rental;
- If opted in, to provide you with marketing offers from We Do Rentals Ltd,
- To protect the rights and property of We Do Rentals Ltd.

Therefore, in accordance with the GDPR, We Do Rentals will process the personal data collected about you for the following lawful purposes:

- to perform our contract with you, or at your request prior to entering into a contract with you,
- for our legitimate interests in operating our business (or those of a third party including the Insurer) and your interests
- to comply with our legal and regulatory requirements
- In accordance with your consent.

### **E) Subject Access Requests**

If you wish to find out what personal information is held about you at any time by We Do Rentals Ltd and or to advise of any amendments to keep personal information accurate and up to date, you must make a written subject access request. Due to procedures and policies we have in place for storing and disclosing personal information all such requests for personal information must be made in writing and sent to We Do Rentals at the address stated above or by email to [dataprotection@wedorentals.co.uk](mailto:dataprotection@wedorentals.co.uk). In your request you should detail the nature access required, along with proof of ID and payment of any relevant fee.

Customers can withdraw their consent at any time to stop We Do Rentals Ltd from processing or accessing their information in line with Article 7 of the General Data Protection Regulations – exemptions to certain information apply.

Please contact the Data Controller at the above address if you wish to withdraw your consent. Withdrawing Consent may inevitably lead to termination of the contract for vehicle hire that we have with you. We Do Rentals may demonstrate compelling legitimate grounds for continuing to process your information which override your rights and freedoms such as those set out in paragraph D.

### **F) Sharing information**

We Do Rentals Ltd may have to share the personal information that we have collected for the reasons set out above, i.e. for the purposes of fulfilling the contract that the information was provided for, i.e. to carry out vehicle rental services, for legitimate interests, for legal and regulatory obligations and in accordance with your explicit consent.

We Do Rentals works with a number of trusted suppliers, agencies, insurers and businesses in order to provide you with high quality services. All third parties with whom we share your personal information are subject to thorough security checks and they will only hold the minimum of personal information needed. Some examples of the categories of third parties with whom we share your data are:

**We Do Rentals Group-** we may share your information with companies within our group of companies as part of our regular reporting activities on company performance.

**Suppliers-** We Do Rentals cross hires some of their vehicles which may subsequently be hired to our customers either through We Do Rentals or by the supplier directly on our behalf. Data will also need to be shared with our Suppliers for the purposes of vehicle maintenance, servicing, breakdowns, in the event of accidents and thefts or billing of damages.

**Contractors-** We Do Rentals may need to share information with your Contractor (as stated in your Indemnity Agreement) at your request prior to entering into a contract with you or to perform our contract with you. This will be necessary to ensure that we fulfil respective contractual obligations.

**Insurers and Brokers –** We Do Rentals will need to share your data with our Authorised and Regulated Insurance Broker's and Insurers at your request prior to entering into a contract with you or to perform our contract with you. This will be necessary to ensure adequate insurance cover can be obtained in order to fulfil respective contractual obligations. We will also need to share your personal data with the Insurers and Brokers in the events of accidents, claims and thefts in order to enable the processing and handling of such matters.

**Payment Processing –** We may need to work with trusted third party payment processing providers in order to securely take and manage payments

**Vehicle breakdown and Recovery services-** We Do Rentals may need to share your personal data with these organisations in order to arrange recovery of our vehicles and equipment.

**Public and Government authorities including law enforcement -** We do rentals will need to share your personal information with these authorities for the purpose of responding to parking and penalty notices and requests for further information in order to transfer liability and for the investigation and prevention of crime.

**IT companies-** We Do Rentals works with businesses who provide ongoing support to our website and other business processes and systems.

**Debt Recovery agencies and other professional advisors (including lawyers, accountants and insurers) -** We may need to share your information with such organisations and professionals in

order to recover any monies due to us and to enforce the terms of the rental agreement contract.

**Other Third Parties** whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively we may seek to acquire other business 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 notice or in accordance with their own GDPR compliant privacy notice.

### **G) How long is personal data stored for?**

We Do Rentals will only retain your personal data for as long as is necessary to fulfil the purposes that we collected it for, including the purpose of meeting any legal, insurance, accounting or reporting requirements. By Law we are required to keep data about our customers for a period of 7 years after they cease being a customer for tax purposes.

You have the right to request erasure of personal data where We Do Rentals can supply no lawful reason for continuing to process it. We Do Rentals may demonstrate compelling legitimate grounds for continuing to process your information which override your rights and freedoms.

Once We Do Rentals have no legitimate reason for processing your personal information it will be securely and safely disposed of.

### **H) Data Breaches**

We Do Rentals have put in place appropriate security measures to protect your data against wilful or accidental loss, destruction or disclosure and to guard it from any non-authorized persons. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator where we are legally required to do so.

### **I) Changes**

This privacy policy will be maintained and updated to reflect any changes in We Do Rentals processes or any changes to legislation or law that might impact how we manage your personal information.

Last updated: 13 May 2018