



**PRIVACY POLICY**  
**VERSION 2.0**

# Introduction

This Privacy Policy explains the circumstances in which we will collect personal data from you, why it is being collected, how we will use it and to whom we may share your data with, if necessary.

We are dedicated to ensuring that your data is protected. In the UK, the main data protection legislation is the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Express Car Leasing is committed to complying with the UK's GDPR legislation and the Data Protection Act 2018 legislation, the principles of data security, and any other applicable laws. We may change this policy often as these laws can be updated at any time. It is always best to check this policy on our website for any changes that may occur.

## About us

Express Car Leasing is a trading style of National Fleet Services Limited.

National Fleet Services Limited is a company registered in England and Wales under company registration number (3247145) whose registered office address is 15 Aston Court, George Road, Bromsgrove Technology Park, B60 3AL.

We are authorised and regulated by the Financial Conduct Authority (FCA) registered number (680691).

## The data we collect

- Personal details/ identity
- Address History
- Contact information
- Email address
- Employment History
- Income and Expenditure
- Market Research – where you have participated
- Product History
- IP Address Information
- Website cookie Data
- Due Diligence Checks
- Recorded phone calls
- Correspondence Records
- Bank Account Details (We do not collect or store card details)
- Date of birth

## How we use this information

The main reason we collect your information is to understand your needs and to provide you with a better service, however there are other ways we may use your information.

We require this information to understand your needs and provide you with a better service, and for the following reasons:

- Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, or mail.

We may use the information to customise our website according to your interests.

We use your data with your consent although there may be instances where we are required to use this information by law or regulation.

Express Car Leasing will only use the personal information that you provide for the purposes we have requested it for. If we do need it to use it for any other reason, we will always make sure that the use is in line with the original reason for collecting the data.

## Sharing Information

Express Car Leasing are a credit broker and not a lender, so there will be other parties involved that will need access to your information including the finance company, third party providers and supplying dealerships.

When required by law we may share your information with other parties to meet legal requirements.

We will also share your information where it is necessary, you will be consented beforehand.

Other parties include

- The lender
- The supplying dealership
- The vehicle manufacturer
- Credit reference agencies
- Advertising and social media
- Where required by Law

## Security

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect.

## Your Rights

**Right of Access** – The right of access is often referred to as “subject access”. You have the right to access the personal information that we hold about you as well as other supplementary information.

You can make a “SAR” (Subject Access Request) verbally, or in writing, including on social media. You may also ask a third-party e.g., a relative, friend or solicitor to make a SAR on your behalf.

**Right of Rectification** – You have the right to have inaccurate personal data rectified and you may also be able to have incomplete personal data completed, however this will depend on the purposes for the data processing.

**Right of Erasure** – Under Article 17 of the UK GDPR you have the right to have personal data erased. The right only applies to data held at the time that the request is received. It does not apply to data that may be created in the future. The right is not absolute and only applies in certain circumstances.

**Right to Restrict Processing** – You have the right to restrict the processing of your personal data where you have a particular reason for wanting restriction.

**Right to Data Portability** – You have the right to receive personal data we have provided to a controller in a structured, commonly used, and machine-readable format. You can also request that a controller transmits this data to another controller.

**Right to Object** – You have the right to object to the processing of your personal data at any time.

**Rights related to automated decision-making including profiling** – You have the right to not be subjected to a decision which is based on automated processing (including any profiling) which may have a significant legal effect on you. You will be sent a copy of the lenders Privacy Policy with your order confirmation, as we are a credit broker and not a lender this right may apply more to the lender and their privacy policy.

## Data Subject Access Request

Should you wish to request the personal information we hold on you, you can do this verbally or in writing, including social media.

A third party may also request this on your behalf, please see the details listed above titled “Right of Access”

There are no charges for this information, however we will undertake ID and security checks before providing any personal information.

We will respond to you within one calendar month after we have received the SAR. If for any reason this time frame is not achievable, we will let you know why and advise how long it will take to provide this information.

## **How we use Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting

## **Links to other websites**

Our website may contain links to other websites of interest, however, once you have used these links to leave our site, you should note that we do not have any control over that other website.

Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **Controlling your Personal Information**

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website or in writing, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting our Data Protection Officer.

We will not sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

## Data Protection Officer

If you have any questions about this policy, or how we hold your personal information please contact our Data Protection Officer, Carmel Rouse.

### In writing:

Express Car Leasing  
15 Aston Court,  
Bromsgrove Technology Park,  
George Road,  
Bromsgrove,  
Worcestershire,  
B60 3AL.

**By telephone:** 0121 427 9477

**By email:** [carmel@expresscarleasing.co.uk](mailto:carmel@expresscarleasing.co.uk)

We are regulated by the Information Commissioner's Office (ICO) for all aspects of Data Protection.

Our ICO (Information Commissioner's Office) Registration number is Z5088418.

You can find us on the Data Protection Register here: [www.shorturl.at/acET4](http://www.shorturl.at/acET4)

## Making a complaint

You can make a complaint to us verbally, by email, in writing or by social media.

We take all expressions of dissatisfaction very seriously; our Complaints Procedure is listed on our website for your reference and is available at any time.

Our Complaints Manager is Carmel Rouse, details are listed directly above under the Data Protection Officer header.

If you are unhappy with the outcome of any complaint made to us about your personal information, you are entitled to complain to the Information Commissioner's Office (ICO).

The contact details for the ICO are below:

Website and Live Chat	<a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>
Telephone	0303 123 1113
Email	<a href="mailto:icocasework@ico.org.uk">icocasework@ico.org.uk</a>
Address	ICO, Wycliffe House, Walter Lane, Wilmslow, Cheshire, SK9 5AF

Should you wish to notify any other Regulated bodies of this complaint, the details are below for the Financial Ombudsman and the BVRLA (British Vehicle Rental & Leasing Association).

### **Financial Ombudsman**

Website and Live Chat	<a href="https://www.financial-ombudsman.org.uk/contact-us">https://www.financial-ombudsman.org.uk/contact-us</a>
Telephone	0800 023 4567
Email	Complaint.info@financial-ombudsman.org.uk
Address	Financial Ombudsman Service, Harbour Exchange Square, London, E14 9SR.

### **BVRLA**

Website	<a href="https://www.bvrla.co.uk/consumer-advice/making-a-complaint-adr/complaints-form.html">https://www.bvrla.co.uk/consumer-advice/making-a-complaint-adr/complaints-form.html</a>
Telephone	01494 434 747
Email	complaint@bvrla.co.uk
Address	BVRLA, River Lodge, Badminton Court, Church Street, Amersham, Buckinghamshire, HP7 0DD