

This policy (together with our Acceptable Use Policy, Terms of Website Use, Cookies Policy and any other documents referred to in them) sets out the basis on which any personal data we collect from you or that you provide to us through use of our products and services, is used by us. Please read the following carefully to understand our practices regarding your personal data and how we treat it.

**This policy covers:**

- Information we collect from you
- IP addresses
- Uses made of the information we collect
- How we store your information
- Our retention of your information
- Disclosure of your information
- Your rights in relation to your information
- Other websites
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**Information we collect from you**

We may collect and process the following data about you depending upon whether you are a user of our services and which services you use:

- Information provided by your employer in order for us to provide our mileage capture and associated services to your employer including:
  - Employee ID
  - First and last name and title
  - Email address
  - Contact phone number(s) (home, work and mobile)
  - Home postcode
  - Work postcode
  - Your fuel card number and associated administrative details
  - Additional details required to order a fuel card from the relevant fuel card provider (including date of birth, nationality, gender, requirement for a chip-only card due to disability)
  - The car scheme of your employer which applies to you and details of any related car allowances and benefits in kind
- Information entered directly by you (or by the user of a vehicle registered under one of our mileage capture schemes where you also use that vehicle) onto our mileage capture system including:
  - Vehicle registration
  - Vehicle details
  - Odometer readings
  - Driving licence details (full name, licence number, country of issue of licence, date of birth, home address and any other relevant addresses, driving entitlements, licence

- endorsements, disqualifications and convictions, Digital Tachograph Card details, photo images, CPC details)
- Image of motor insurance certificate and insurance policy number
  - Image of MOT certificate
  - Trip detail (trip mileage, purpose, date, to and from locations, whether a passenger was taken on the trip, length of time out of office, whether you purchased a meal, images of VAT receipts, GPS co-ordinates/locations, Google polyline of autotracked journeys)
  - Details of hire vehicles or other temporary vehicles
  - Information submitted by you in any appeal process through our mileage capture system or by calling our call centre or otherwise contacting us by phone or email
- Information about you provided by third parties:
    - Data from your employer's fuel card provider or other corporate card provider relating to the spend held on the card(s) used by you, products purchased, transaction location and vehicle odometer readings
    - Data from any vehicle leasing companies used by your employer including leasing start and end date and details of any fines incurred
  - Other information:
    - Information that you provide by voluntarily filling in forms on our site [themilesconsultancy.com](http://themilesconsultancy.com) (our "site"). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services such as name, business email address and business telephone number. We may also ask you for information when you report a problem with our site
    - If you contact us by phone or email, we may keep a record of that correspondence
    - We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them
    - Details of your visits to our site including, but not limited to, traffic data, location data, images of you linked to your contact details which you have made public, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access
    - Information relating to email correspondence we have sent to you which enables us to see when you have opened an email we have sent to you and when you have opened any links within that email

### **IP addresses**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to interested parties. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

### **Uses made of the information we collect**

We use information held about you in the following ways:

- To provide our mileage capture, audit, fuel management and compliance products and services to your employer
- To provide customer service support to you and your employer

- To carry out our obligations arising from any contracts entered into between you and us or between us and your employer
- To continually improve our products and services, including adding functionality to our mileage capture system and mobile app
- For the purpose of our legitimate business interests, which include:
  - ensuring that content from our site is presented in the most effective manner for you and for your computer
  - providing your employer with information, products or services that they request from us or which we feel may interest them
  - allowing you to participate in interactive features of our service, when you choose to do so notifying you about changes to our service

### **How we store your information**

The data that we collect from you is stored on servers in the UK but it may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”) subject to adequate safeguards being in place as approved by your employer. 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 own secure servers or secure servers provided by third parties who have agreed to comply with our data protection and security requirements. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

### **Our retention of your information**

We retain your data for as long as necessary to enable us to: (i) provide the relevant products and services and fulfil our contractual obligations, to your employer; (ii) assist your employer should it be subject to an inspection by tax authorities; (iii) comply with our legal and other contractual obligations; and (iv) resolve disputes and enforce our agreements. Specific retention periods apply for different categories of data.

### **Disclosure of your information**

- We may disclose your personal information to any member of our group and to the following third parties:
- To your employer in order for us to provide our products and services to them
- To any suppliers or sub-contractors engaged by us to enable us to provide our products and services to your employer. Such suppliers or sub-contractors must comply with our data protection and security requirements

- To other suppliers providing services to TMC provided such suppliers comply with our data protection and security requirements
- Any potential purchaser of, or investor in, The Miles Consultancy Limited or its business and assets
- Any party to whom we are under a duty to disclose your personal data in order to comply with any legal obligation, enforce our terms of use and other agreements; or to protect the rights, property, or safety of The Miles Consultancy Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may provide third parties who work with and/or advise the government on tax issues and policies relating to our business with aggregate information from data collected about users of our products and services but such information does not identify any individual.

### **Your rights in relation to your information**

- The Miles Consultancy Limited adheres to applicable data protection laws in the European Economic Area, which include the following rights:
- If the processing of personal data is based on your consent, you have a right to withdraw consent at any time for future processing
- You have a right to request access to and rectification of your personal data. You can view, edit or delete certain of your personal information via our mileage capture system, or you may ask us to correct, update or remove information you think is inaccurate by contacting our customer service team
- You have a right to object to the processing of your personal data
- You have a right to lodge a complaint with a data protection authority
- You have the right to request a copy of the information we hold about you – please refer to the Contact section below.

### **Other websites**

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Changes to our privacy policy**

Any changes we may make to our privacy policy will be posted on this page and, where appropriate, notified to you by email.

### **Contact**

Any questions, comments, requests and complaints regarding this privacy policy or your personal information should be addressed to [data.protection@tmc.co.uk](mailto:data.protection@tmc.co.uk).