

## Appy Fleet – Privacy Policy and Cookie Policy

Appy Fleet Limited (registered company number 10387540), Global House, Westmere Drive, Crewe, CW1 6ZD.

### COOKIE POLICY

So what's a cookie? Well, it's a simple text file that is stored on your computer or mobile device by a website's server and only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier, the website name and some digits and numbers. If you want to get even more 'techy' than this simple explanation, you might want to read some more at <http://www.allaboutcookies.org>.

We use the following types of cookies:

- Strictly necessary cookies – we need these to operate our websites [www.appyfleet.co.uk](http://www.appyfleet.co.uk) and [www.trakglobal.co.uk](http://www.trakglobal.co.uk) including our apps (the **Sites**);
- Analytical/performance cookies – we use these to improve your online experience on the Sites and to enable us to understand which areas of them are of most interest to you. We may also share this information with our partners for this purpose, please see our Privacy Policy below for further information;
- Functionality cookies – these recognise you when you return to the Sites so you don't need to log in every time;
- Targeting cookies - these cookies record your visit to the Sites, the pages you have visited and the links you have followed. We will use this information to make our Sites and the advertising displayed on them more relevant to your interests. We may also share this information with our partners for this purpose, please see our Privacy Policy below for further information.

None of our cookies store personal information such as your name, address or financial details or any other sensitive information about you without your express permission to do so.

If the settings on your browser are adjusted to accept cookies then we take this, and your continued use of the Sites, to mean that you agree to our use of cookies in the ways described in this Cookie Policy. You can delete any cookies stored on your computer but this may prevent you from getting the most from your next visit to the Sites.

Please note that third parties such as those that provide us with web traffic analysis services may also use cookies, including those listed below (likely to be analytical/performance cookies), but we have no control over this use.

Except for essential cookies and those marked with \* in the table below, all cookies will expire after a maximum of 30 days. The cookies in bold in the table are essential cookies which will continue to apply unless you delete them.

### Cookies used on our website:

Cookie Name	Usage
ARRAffinity	<b>To make sure the user is directed back to the same server in the load balanced environment</b>
_ga	To allow us to count page visits and traffic sources so we can measure and improve the performance of our site, using a service provided by Google Analytics
_gat	To allow us to count page visits and traffic sources so we can measure and improve the performance of our site, using a service provided by Google Analytics

### Fleet Manager Portal

Cookie Name	Usage
.trakfleetmanager	<b>To allow us to identify the fleet manager once you have logged in, and remember you per page request.</b>
ARRAffinity	<b>To make sure the user is directed back to the same server in the load balanced environment</b>
_ga	To allow us to count page visits and traffic sources so we can measure and improve the performance of our site, using a service provided by Google Analytics*
_gat	To allow us to count page visits and traffic sources so we can measure and improve the performance of our site, using a service provided by Google Analytics*
ai_session	<b>To allow us to monitor the performance of the application and detect an errors, thus allowing us to improve performance and solve errors</b>
ai_user	<b>To allow us to monitor the performance of the application and detect an errors, thus allowing us to improve performance and solve errors</b>

\* These cookies last for 12 months if you do not delete them.

## **PRIVACY POLICY**

### **Introduction**

APPY FLEET LIMITED ("We" or "us") take your privacy seriously and are fully committed to handling the information we collect from you in a secure and responsible manner. We are dedicated to protecting and respecting your privacy.

This policy (together with our Appy Fleet Terms and Conditions of use and any other documents referred to in it) sets out the basis upon which any personal information we collect from you, or that you provide to us, will be processed by us when you are using our

websites [www.appyfleet.co.uk](http://www.appyfleet.co.uk) and [www.trakglobal.co.uk](http://www.trakglobal.co.uk) including our apps (the "Sites"). Please read this policy carefully before you use the Sites and/or register with us. If you do not agree with the ways in which we intend to use your personal information then please do not continue to use the Sites.

For the purpose of the Data Protection Act 1998 including any subsequent legislation, the data controller is APPY FLEET LIMITED, a company registered in England and Wales under company number 10387540, whose registered office is at Global House, Westmere Drive, Crewe, CW1 6ZD.

The Sites provide a platform for drivers to upload information relating to their vehicle's journeys so that the company for whom they are driving ("Fleet Manager") can analyse that information for their own business purposes. You do not need to register to browse the Sites, and this privacy policy sets out how we will use your personal information, regardless of whether you register with us, when you are generally browsing and using the Sites, but if you want to download and use the app then you will need to register with us and agree to our terms of use of the app.

Registering with us means that we will use your details to set up and maintain an account on the Sites. You will only be able to access your own personal information and information about your vehicle until your account is connected to a Fleet Manager that has been approved by us and when your particular vehicle has been assigned to them on the Sites. Details of this set up are provided in our Appy Fleet Terms and Conditions.

Whilst we will remain responsible for the personal information that we collect and/or process about you in relation to the Sites, once your account is linked to a Fleet Manager they will have full access to all your personal data and analytical and statistical information via the Sites unless you change your settings on the Sites to prevent certain information from being shared in this way. Fleet Managers' use of any personal information shared with them via the Site is subject to their own privacy policies and they will be deemed to be a separate and severable data controller in respect of their collection and processing of your personal information.

By registering with us or by allowing a Fleet Manager to register with us on your behalf, you are agreeing that we may contact you in relation to the management of your account with us. You can update your preferences by logging in to your account on the Sites and changing your settings or by emailing us or writing to us, please see the 'Contact us' section of this policy.

### **Collecting and using your personal information**

We may collect and process the following personal information about you:

#### **1. Information you give to us**

You may give us information about you by:

- browsing the Sites (e.g. your IP address, operating system and browser type).

- registering on the Sites (whether you have registered directly or a Fleet Manager has registered you on your behalf).
- corresponding with us by phone, e-mail or otherwise (we may record and/or monitor calls for quality checks, staff training and to help us detect, prevent or combat fraud or other crime).

This includes information you provide when you browse the Sites, register to use the Sites, participate in any sharing or social media functions on the Sites or carry out any other activity via the Sites, or when you report a problem with the Sites or discuss your registration on the Sites or use of them with us.

The personal information you give us may include your name, address, e-mail address, phone number, age category, details of your vehicle, details of the Fleet Manager that you drive for and anything else that you choose to share with us when doing any of the activities mentioned in this section.

We may use this information:

- to provide you with the information and services that you request from us (please see the Appy Fleet Terms and Conditions for more details);
- to check or confirm your identity if you contact us about your use of the Sites or to identify, prevent, detect or tackle fraud or other crime;
- to notify you about changes to the Sites;
- to ensure that content from the Sites is presented in the most effective manner for you and for your device (computer, tablet, phone or other device). We may use information from cookies and similar technologies to help us with this;
- to create aggregated or statistical data to use for analytical or research purposes to understand and improve customer service, Site experience, and your interest in our products and services. We may share aggregated or statistical information with third parties for their similar purposes;
- by sharing it (and any aggregated or statistical data created from it) with the Fleet Manager that you are connected to on the Sites in accordance with the Appy Fleet Terms and Conditions;
- to provide you with information about other goods or services which we feel may interest you, where you have consented to be contacted for such purposes;
- to permit selected third parties to use your data to provide you with information about goods or services which may be of interest to you. We will only provide your data to third parties for this purpose if you have given your consent for us to do so.

## **2. Information we collect about you**

Depending on your cookie settings (see our Cookie Policy above) and any settings options provided within the Sites, we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer or other device to the Sites, your login information, browser type and version, time zone setting, location data, browser plug-in types and versions, operating system and platform;
- information about your visit to the Sites, including the full Uniform Resource Locators (URL) clickstream to, through and from the Sites (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer support services number;
- information that we generate through your use of the Sites including, but not limited to, your vehicle's exact location, its speed and its direction of travel (you can use your settings on the Sites to choose which of this information is collected on the Site at any time);
- we may also ask you to complete surveys that we use for our own research purposes, although you do not have to respond to these requests.

We will use this information:

- to administer the Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the Sites to ensure that content is presented in the most effective manner for you and your device;
- to allow you to participate in interactive features of our service and connect the Sites with social media platforms;
- as part of our efforts to keep the Sites safe and secure;
- by sharing it (and any aggregated or statistical data created from it) with the Fleet Manager that you are connected to on the Sites in accordance with the Appy Fleet Terms and Conditions;
- to provide you with information about other goods or services which we feel may interest you, where you have consented to be contacted for such purposes;
- to permit selected third parties to use your data to provide you with information about goods or services which may be of interest to you. We will only provide your data to third parties for this purpose if you have given your consent for us to do so.

### **3. Information we receive from and share with other sources**

We work closely with the following third parties:

- Advertising and marketing, analytics and social media providers. This will involve sharing fully identifiable data including use data (e.g. what's in your browse history), details of the information collected whilst using the Sites), social data (e.g. links that you have clicked on and what they relate to), and communications data (relating to queries or complaints received by phone, email or text), and personal information (your full name);
- Selected third party partners. Analytical information will be shared without your personal details to help them understand your use of the Sites in order to improve their products and services offered to you through the Sites;
- The Fleet Manager that you are connected to on the Sites in accordance with the Appy Fleet Terms and Conditions.

We may combine any information from the sections in this paragraph for the purposes set out above (depending on the types of information we receive).

### **Storage and deletion of your personal information**

All personal information you provide to us will be stored on our secure servers or those of third parties or contractors we engage to help us run our business. We will keep information no longer than we need to for the purpose for which we collected it. The period of time for which we keep personal information depends on any legal retention period to which we are subject and according to business needs. If you have registered with us then we will keep your personal information for at least as long as you are registered with us.

The personal information that we collect from you may be transferred to and held by us, or third parties/contractors at a destination outside the European Union that does not have equivalent data protection laws to those in the UK. We will put in place appropriate measures for the secure and confidential treatment of such personal information.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Sites, for example when you register with us, 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 take appropriate measures to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Sites and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The Sites may include social networking features. Please ensure when using these features that you do not submit any personal information that you do not want to be seen, collected or used by other users.

We will store all your personal information necessary for administering your account on the Sites (i.e. 'Information you give us' and, where relevant, 'Information we receive from and share with other sources') for as long as you are registered with us. In respect of all other

information (i.e. 'Information we collect about you') we will destroy this information after 30 days of receiving it unless you have given us your permission to keep it for longer.

### **Disclosure of your personal data to Fleet Managers**

The Sites may, from time to time depending on your cookie and/or Site settings, automatically upload your personal information to the Fleet Manager that you are connected to on the Sites in accordance with the Appy Fleet Terms and Conditions. Please note that we have no control over any use of your personal information by such parties upon the transfer of your personal information and that their use of your personal information will be dealt with under their own privacy policies. We do not accept any responsibility or liability for these policies or for the processing of your personal information by those parties. Please check those policies before you submit any personal information to these parties.

### **Other disclosures of your personal information**

We may disclose your personal information to third parties if we are under a duty to disclose or share it in order to comply with any legal obligation, in order to enforce or apply our Appy Fleet Terms and Conditions, where we think it appropriate to protect the rights, property, or safety of Appy Fleet Limited, its staff and contractors and partners, visitors to the Sites (whether registered or not) or others. This includes exchanging information with other companies and organisations for the purposes of the prevention and detection of crime.

We may also share your personal details with any person (and their and our legal and professional advisers for this purpose) with whom we are negotiating any sale, transfer or re-organisation of the business. If this sale, transfer or re-organisation goes ahead, the acquiring party of the business or part of it may use your personal information in the same ways as set out in this policy.

The Sites 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 and any services that may be accessible through them (including those linked to your location) have their own privacy policies and that we do not accept any responsibility or liability for these policies or for the processing of your personal information by those parties. Please check those policies before you submit any personal information to these websites.

### **Your rights**

You have the right to ask us not to process your personal information for marketing purposes. You can exercise this right by ticking the relevant box situated on the registration form or at any time afterwards by contacting us (please see the 'Contact us' section of this policy).

Subject to certain exceptions, the Data Protection Act 1998 gives you the right to access personal information we hold about you. You can exercise this right by emailing or writing to us (please see the 'Contact us' section of this policy) to request this and sending us the prescribed fee of £10.

Please help us to keep your personal details up to date by promptly notifying us of any changes, for example if you change address or telephone number. If you need to change your personal details or preferences at any time please log in to your account on the Sites to change your settings or contact us (please see the 'Contact us' section of this policy).

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

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

### **Contact us**

If you have any questions, comments or requests regarding this policy please address them to:

Telephone: 0800 023 5338

Email: [support@appyfleet.co.uk](mailto:support@appyfleet.co.uk)

Post: Appy Fleet Limited, Global House, Westmere Drive, Crewe, CW1 6ZD

**Date:** February 15th 2017

**Version:** 2.0