

Privacy Notice

This privacy policy details how Newmarket Plant Hire Ltd (hereby known as NPH) uses and protects the information you give to us. NPH is committed to ensuring that your privacy is protected and if we ask for information about you, we will take all possible steps to keep it safe. NPH may use this information to report any changes to the business (and any changes to this notice will be posted here). You are encouraged to regularly check this link to ensure that you are happy with the changes.

NPH may use the information you provide to inform you about new products or services that you may be interested in or to send you information you have requested or that we feel will be useful to you. We are committed to ensuring that your information is secure and in order 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 online.

Data Breach

Should NPH be the victim of a data breach we will report this within 72 hours of becoming aware of the breach, where feasible.

If the breach is likely to result in a high risk of adversely affecting individual's rights and freedoms, we will inform those individuals concerned without undue delay.

NPH have a robust breach detection, investigation and reporting procedure in place and this will facilitate the decision making process about whether or not there would be a need to notify the relevant supervisory authority and the affected individuals.

All instances of a data breach will be recorded regardless of whether the need arises to notify.

Data Protection Act

In addition to the company's safeguards, your personal data is protected in the UK by the provisions of the Data Protection Act. This provides, amongst other things, that the data we hold about you should be processed lawfully and fairly. It should be accurate, relevant and not excessive. The information should be kept up to date, where necessary, and not retained for longer than is necessary. It should be kept securely to prevent unauthorised access by other people. You have the right to see what is held about you and correct any inaccuracies online.

'Cookies'

The NPH website uses cookies. Cookies are small files of letters and numbers that are placed on a user's device which allow us to distinguish you from other users of the site. This helps us to provide you with a better online experience and record your preferences when you browse our site for future visits.

We also use 'analytical' cookies which allow us to recognise and count the number of visitors to our site and to see how visitors move around the site when they are using it. This helps us to improve the way the site works.

You can change your browser settings at any time to disable cookies if you have privacy concerns. Browsers have tools to help you delete or block cookies from being set. It is important to remember that many sites need cookies to work properly, so by deleting or blocking them, some parts of the sites may not function correctly. Cookies set prior to you changing your settings will still be on your device and you can remove them by changing your browser settings. More information about cookies, including how to block them or delete them, can be found at [AboutCookies.org](https://www.aboutcookies.org).

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.

Personal Information

In general you can visit us on the internet without telling us who you are and without giving any personal information. You may choose to give us personal information in a variety of situations. For example you may give us your name and address or e-mail id, in order for us to contact you, or send further information to you. Unless you advise us not to, we may contact you with other specific NPH related information from time to time. If you give us personal information about somebody else we will assume that you have their permission to do so. We will not share any personal information that you provide with any third party outside of our company

What Information Do We Collect And When

We only collect information that we will use for the purposes set out in this notice.

Specifically, we collect:

- **Information you submit to us:**

Through forms, for example such as by filling in our 'Enquiries', 'Join us' News & offers and 'used plant ' forms on our Site;

By sending us emails and text messages;

By adding posts, reviews and other comments to our Site;

By interacting with us on social media platforms;

By speaking to us in our depots or over the telephone, for example in making an enquiry or a complaint about a product you have hired or purchased;

By applying for or registering accounts with us.

By applying for a job with us or registering your interest in doing so, either directly with us or via a third party recruitment agent.

- **Information we collect about you**

Full details of the purchases you make from us, including the time and date of purchase, the products and services you purchase from us, any relevant delivery address(es) and details of any relevant payment cards or bank account details.

Your social media content (where this is in the public domain) and any messages you send us via social media. This information can include posts, comments, pictures and video footage.

CCTV Images This information may include images of you from CCTV cameras installed externally and internally at our depots and other sites. We use this information for the purposes of public safety and the prevention of fraud and other criminal activity.

DashCam ImagesThis information may include images of you from Dashcam cameras installed on our fleet of vehicles. We use this information for the purposes of public safety and the prevention of fraud and other criminal activity

Basic background information on you available from government sources. We use the Driver Vehicle Licensing Agency to trace number plates and owners in the event of drive-offs from our depots.

Information from banking, credit card and credit reference agencies about your financial status and the status of any payment card presented to us (for example, if it has been reported stolen) to check we are likely to be paid for any transaction and to reduce the risk of fraud.

Information about you for the purposes of processing your job application or registering your interest in a job with us. This includes including your name, contact details (i.e. address, home and mobile phone numbers, email address), details of your job application (including the application itself, your qualifications, experience and references and employment history, including details of current salary and benefits).

How Do We Use Your Information

We use the information we collect for the following purposes:

- **To provide you with our Site**, which requires a certain amount of technical information to be collected in order to work properly.
- **To enable us to run competitions and offers**, about which we need to be able to communicate with you.
- **To gather feedback from you** about our Site, our products, our services and activities from time to time. We may invite you to provide this feedback on occasion, for example by emailing you to ask if you would like to review equipment you have hired. We may use independent research and feedback providers to do so on our behalf.
- **To contact you from time to time about things you have told us you want to hear about**, for example our products, services, news, offers, new competitions and sponsored events.
- **To respond to any questions, suggestions, issues or complaints** you have raised with us.
- **To respond to any social media posts or other public comments you make where** these are made to or about us, our Site and our products, services or other activities.
- **To communicate with you about operational changes to our Site, our products and our services**, for example, new products.
- **To perform any contract we have entered into with you** but also to enforce a contract against you if you do not honour it, including seeking to collect any debts that you may owe us and instructing third parties to support us in doing so.
- **To check that you have or are likely to have the means to pay us** for any products or services you have ordered from us.
- **To monitor use of our Site to see if it is being abused or threatened**, for example by people posting inappropriate comments in review areas or by potential hackers attempting to undermine our security measures.
- **To protect you and our business against any other criminal behaviour**, including identity theft and fraud.
- **To maintain administrative and legal records about our business** to enable us to understand what we have sold, how, when, where and at what price and account to HM Revenue & Customs for the related taxes that we have to pay.
- **To enable us and our third party service providers to plan and manage our day-to-day business and related services as effectively as possible**, for example in predicting likely sales

volumes for each of our products and services, so we can try and make sure we have enough stock and resource to meet likely demand.

- **To contact you in relation to jobs that may be of interest to you and/or to assess your suitability for a particular role** and to comply with legal, regulatory and corporate governance obligations and good employment practice.

Legal Basis For Using Your Information

In accordance with data protection law, we are obliged to inform you that we are using your information as described in this policy on one or more of the following legal bases:

- you have given your consent to us using your information as described in this notice;
- the use is necessary to perform a contract between us or to take steps which you requested us to take before entering into a contract;
- the use is necessary to comply with a legal obligation to which we are subject;
- the use is necessary for the performance of a task carried out in the public interest or in the exercise of our official authority;
- the use is necessary for the purposes of our legitimate interests, including direct marketing, fraud prevention or preventing crime and protecting public security.

Use Of Your Sensitive Personal Information

We may on occasion collect sensitive personal information about you. By way of example, information about your racial or ethnic origin may be included within the identification information you provide to us as part of our account opening process and/or we may check and record your identification information during our verification process on collection of our hire equipment.

We will use this sensitive personal information for the purposes of identifying individuals to combat fraud and other criminal activity. We will share this sensitive personal information with the police and our insurers and other organisations that provide similar products and services to ours for the purpose of fraud and crime prevention.

Who Do We Share Your Information With

We are unable to run our business or provide many of our services and benefits without involving other people and businesses and sometimes we pass your information to these other people and businesses as set out below. We only share your information where we can do so in accordance with our legal data protection and privacy obligations. We share the information we collect with

- **Our different depots units that have relationships with our customers and users.** We do so because we hope to have a relationship with you across our different depots and we want to be able to provide you with the same value and high quality of experience.
- **Our insurers and insurance brokers** where required in order for us to be able to obtain insurance against risks we face in running our business. They may retain this information for the purpose of ongoing risk assessment and insurance broking and underwriting services.
- **Credit reference agencies** who provide anti-fraud and credit score information to us, **central and local government departments**, for example the Driver Vehicle Licensing Agency (DVLA) and local authorities who run the UK electoral rolls, **banks and finance companies** who also provide anti-fraud services and **customer insight companies** (as set out above), in each case as necessary in order to benefit from their services. Where we do so for anti-fraud purposes, the recipient organisation may hold your information on file for the purpose of their fraud prevention services in future. We may also share your information, including late payment

information, with credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors.

- **Business partners, suppliers and sub-contractors** for the performance of any contract we enter into with them or you.
- **The prospective buyer** of any part of our business or assets that we may sell.
- **Our professional advisers** for example our lawyers, accountants and technology consultants when they need it to provide advice to us.
- **The police, local authorities, HM Revenue & Customs (HMRC), the courts** and any other central or local government bodies where they request it and/or where we may lawfully disclose it, for example for the prevention and detection of crime.
- **Other people who make a subject access request to us**, where we are allowed to do so by law (see **Managing Your Information** below for what we mean by a **subject access request**).

We may also share the information we collect where we are legally able to do so, for example, to comply with a court order.

How Long Do We Keep Your Information For

In accordance with our legal data protection and privacy obligations, we will only retain your information for as long as is necessary for the purpose for which it was collected. We will then either securely delete it or anonymise it so that it cannot be linked back to you.

Managing Your Information

You can contact us with any queries about how we use your information at any time by contacting our Data Manager on enquiries@nphgroup.co.uk or at Depot Road, Newmarket, Suffolk CB8 0AL

It is very important to us that all the information we hold about you remains accurate and up to date to reduce the risk of a misunderstanding.

We need your help in doing so. Please ensure that any information (for example, contact information) you provide to us remains accurate and up to date. Please review and update it regularly.

You have a number of rights which we respect and aim to uphold in everything we do. These rights are set out below.

We reserve the right not to comply with any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious, technically very onerous, to involve disproportionate effort or harmful to the rights of others.

a) Asking us about your information: You have the right to ask us whether we hold information about you and, if so, for us to give you certain details about that information and/or the information itself. This right is commonly known as a **subject access request**. If you would like to make a subject access request, please do so in writing to the address above.

b) Correcting inaccurate information: If you have reason to believe any of the information we collect on you may be inaccurate or incomplete, and you cannot correct such inaccuracy or omission yourself through your account with us, please contact us with your queries and/or with the updated information.

c) Erasing information You have the right to require us to erase your information in the following circumstances:

- The information is no longer necessary for the purposes for which we collected it;
- We need your consent to use the information and you withdraw your consent;

- You object to us using your information: (1) for the performance of a task carried out in the public interest; or (2) for the purposes of our legitimate interests (e.g. direct marketing) and there are no overriding legitimate grounds for the processing;
- You unsubscribe from our marketing communications;
- We have used your information unlawfully;
- The information must be erased for compliance with a legal obligation to which we are subject.

d) Restricting processing You have the right to require us to restrict our use of your information where one of the following applies:

- While we verify the accuracy of the information that we hold about where you contest the accuracy of the same;
- We have used your information unlawfully, but you request us to restrict its use instead of erasing it;
- We no longer need the information for the purpose for which we collected it, but you need it to deal with a legal claim; or
- While we check whether our legitimate grounds override your right to object where you have objected to us using your information.

e) Right to object Where we are using your information on the basis of public interest or our legitimate interests, you have the right to object to this at any time by contacting us using the contact details set out below.

f) Withdrawal of consent Where you have given your consent to us using your information (e.g. for marketing purposes), you have the right to alter your preferences or withdraw this consent at any time by contacting us using the contact details set out below or, where applicable, through managing your preferences through your online account with us or clicking the 'unsubscribe' link. This will not affect the lawfulness of any use of your information that we make before you amend your preferences or withdraw your consent.

If you have any questions or complaints about our use of your information, please contact us on enquiries@nphgroup.co.uk or at Depot Road, Newmarket, Suffolk CB8 0AL.

We hope that we can resolve any query or concern you raise about our use of your information but you can also contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.