

## **APP A VAN LIMITED PRIVACY POLICY**

### **Introduction**

We understand and respect the importance of protecting your privacy and your personal information. App A Van are committed to processing personal information in ways that comply with our legal and regulatory obligations. Being transparent about what we do with personal information is an important element in trusting us with your personal information.

This privacy policy explains how we look after and use your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us regarding the marketing you want us to send you.

Our privacy policy explains how we do this and tells you about your privacy rights and how the law protects your personal information.

### **We will:**

- Keep your personal information safe and private;
- Not sell your personal information;
- Give you ways to manage and review your marketing choices,
- Only pass your personal information to trusted partners if we have your consent;

This policy reflects your rights as of 1<sup>st</sup> May 2019. This policy may be updated from time to time.

### **How the law protects you and your personal information:**

Data protection law says that we can only use your personal information if we have a proper reason to do so. This includes sharing personal information with third parties.

To use your personal information, we must have one or more of the following reasons to do so:

- To do something before entering into a contract with you such as but not limited to, carrying out a survey and/or preparing a quotation for you;
- To fulfil a contract with you;
- When it is in our legitimate interest; or
- When you have given your consent;

A legitimate interest is when we have a business or commercial reason to use your personal information. However, we must not use your personal information unfairly.

### **Where we collect personal information from you**

We may collect personal information about you from these sources:

- Information you give us when you enquire about our services;
- When you speak to us on the telephone or in our offices;
- You use our website;
- In e-mails letters and other documents;
- You take part in Live Chat;
- We attend your home and carry out a sales survey;

- You take part in a video survey;
- You enter a competition or promotion via our website;
- Provide customer feedback;
- You report a problem using our website;
- We ask you for contact details for future marketing or promotions which may be by email, post, or text or if you sign up to receive promotions or newsletters from us although we will give you the option to say whether you wish to receive such communications or to opt out at a later stage.
- When products or services are provided in association with a business partner and your personal information is collected by them, with your consent, and you have consented to us contacting you.

### **Information from third parties:**

We may use personal information passed to us from third parties such as but not limited to:

- Organisations, firms or companies that introduce us to you;
- Insurers;
- Retailers;
- Comparison websites;
- Social networks;
- Estate agents;
- Loyalty scheme operators;
- Agents working on our behalf;
- Market researchers;
- Government or law enforcement agencies;
- Employers;
- Local authorities;
- Agents acting on your behalf;

### **Information we collect**

We collect the following information about you:

- name;
- address;
- e-mail address;
- telephone numbers;
- bank details;
- payment details;
- your consent to receive notifications of special offers or promotions which may involve or be provided by us, or selected and trusted third parties;
- information required to enable us to provide you with services;
- where relevant, your company or employer's name, your employment position, company address, company's e-mail address and telephone numbers;
- information collected through our website such as but not limited to, your internet provider address (IP address), operating system and browser type. Please see our Cookie Policy below;
- details of any enquiry, claim, or complaint you make in relation to the services;
- information on any inventory, job sheet, collection/delivery documentation, shipping manifest, customs documentation or similar documents used for the export or importation of your goods;

## **How we use your personal information**

We will use your personal information for the following purposes;

- to arrange a personal or video survey;
- preparation of a quotation;
- to carry out contractual obligations to you;
- to instruct a third-party supplier/sub-contractor;
- accounting, billing and audit;
- credit or other payment card verification;
- preparation of export or importation documents as necessary;
- arranging insurance;
- immigration or customs documentation;
- general administration;
- to communicate with you regarding the services;
- to notify you of any changes to the services;
- collecting payment;
- where necessary arranging refunds. Please note that any payments or refunds will be made to the account/card which was used to make the latest payment. By providing the account or card details you, and the account/card holder consent to us doing this;
- providing you with any tips or guidance for moving home;
- reporting, research or analysis;
- to contact you with administrative or service messages even where you have told us you do not wish to receive direct marketing (please refer to the direct marketing section below);
- check and verify your identity when you use our services;
- instruct third parties (insurers, sub-contractors, shipping lines, airlines, railway companies, or agents for example) to assist us in the provision of the services;
- to communicate with your insurer and or their appointed claims handling agents, or loss adjusters;
- enable us to review, develop and improve our products or services;
- ensuring our website is presented to you in the most informative and effective manner;
- analysing your usage of our website and viewing patterns;
- developing other products or services of our own or with trusted third parties;
- to notify you of products, services or offers available from trusted third parties;
- to monitor and improve the quality of our service and products;
- for managing claims, complaints or disputes including corresponding with third parties appointed to assist in the resolution of a complaint or claim such as but not limited to an appointed alternative dispute resolution body;
- for the prevention or detection of crime;
- for debt collecting;
- processing or disclosure of your information outside the UK/EEA where required;
- to meet our legal and statutory and compliance obligations;

## **Who we share your personal information with**

We may share your personal information with:

- Companies who provide us with video survey facilities;
- Agents, suppliers or sub-contractors who we use to assist in providing the services;
- Organisations who introduce you to us;
- Organisations who we introduce to you;

- HM Revenue and Customs, regulators or other authorities;
- Companies or organisations you ask us to share your personal information with;
- Insurers;
- Claims Handlers;
- Trusted third parties who offer a product or service which is of interest to you;

We may disclose personal information to any member of our group for business purposes, which includes but is not limited to subsidiaries, our ultimate holding company and its subsidiaries as defined in section 1159 of the Companies Act 2006 and to any relevant third parties for providing services.

### **Transfer of information**

Some third parties who we pass personal information to, maybe based outside the European Economic Area (EEA). Organisations that are based outside the EEA may be subject to local or national data protection regimes which may not have the same level of controls regarding data protection as currently exist with the United Kingdom or the EEA.

### **We will only send your personal information outside the EEA to:**

- Follow your instructions;
- Comply with a legal duty;
- Work with our agents and third parties who provide business and administrative support functions and assist in carrying out our services.

From time to time we may be required to disclose certain personal information to local or national government bodies or authorities responsible for crime prevention, immigration, customs, border control, security and anti-terrorism. Although it may not be mandatory to provide such information to these authorities, we may do so in circumstances where we consider it appropriate to comply with their request.

PLEASE NOTE: If you do not agree to our use of your personal information in accordance with the terms of this policy, we cannot accept your booking or provide you with services, as the processing of your personal information is essential in providing you with a quotation and carrying out the services you have requested.

### **Keeping personal information accurate**

We will ensure that personal information is kept accurate and up to date as far as reasonably possible. However, we rely on you to ensure that your personal information is accurate and up-to date. It is your responsibility to inform us of any changes to your personal information. This can be done by writing or e-mailing us and requesting changes to be made.

Who we can deal with/third parties

We are unable to accept any instructions from anyone other than you, the person named on the contract documentation. If you wish a third party to act on your behalf, we will require evidence that they have your express authority to do so. Such evidence could be in the form of a power of attorney or other written form of authority or in some circumstances we may be prepared to accept your verbal instructions.

### **Retention of personal information**

We will retain your personal information for no longer than necessary for the maintenance of your account and while we are providing on-going services to you. We will also retain your personal information to meet legal or regulatory requirements. We will not retain your personal information for longer than seven years (the Retention Period) from the date when you cease to be a customer of ours. We may keep your personal information longer than seven years if we cannot delete it for legal regulatory or technical reasons.

**We keep your personal information for the following reasons:**

- To respond to claims or complaints;
- To show we have treated you fairly;
- To maintain our business records;
- Where we are required to do under a contract;

**Fraud prevention and detection of crime**

To detect fraud, we or insurers may at any time share information about you with law enforcement bodies including but not limited to the police. They in turn may access and use the information we have passed to them.

**Cookies**

Cookies are small data files which are saved to your website browser to collect certain information about your use of the European Moving website. They distinguish you from other users. Some of these cookies are essential to make the web site work properly and to enhance your experience.

There are two types of cookie, session cookies which exist during the visits to the website and are erased when you close your web browser, and persistent cookies which are stored until they expire, which can be within hours or years later.

We also use JavaScript to speed up your experience while you are visiting our website.

Cookies are used by us to collect anonymous information to enhance your experience with our website in the future and to assist us in identifying your needs or requirements.

You have the option to change your browser settings to accept or reject cookies. If cookies are already on your computer, you can delete them.

If you delete either the cookies or the JavaScript this may impair the functionality of our website.

Accepting/ rejection or deleting cookies or Java Script will vary from browser to browser so please consult your browser's Help menu for further advice or information.

**Hyperlinks**

Our website may provide hyperlinks to other locations or websites on the Internet. The hyperlinks lead to websites operated by third parties and are subject to their own privacy policies.

We endeavour to select reputable websites and sources of information for your convenience.

## **Direct marketing**

Your personal information may be used by us to contact you by post, phone, e-mail or electronic messaging services and social media, with information about products and services (including discounts and special offers) we think will be of interest to you.

We may also send you information about services and products provided by third parties and/or trusted partners which may be of interest to you.

## **How to opt out of marketing**

If you wish to opt out of receiving marketing messages from us, then please:

- Tick the box on the web site to confirm that you do not wish to receive any information;
- If you have opted to receive information but change your mind, e-mail your Move Coordinator quoting your IDC reference number; or
- Email [optout@europeanmoving.co.uk](mailto:optout@europeanmoving.co.uk) quoting your IDC number;

Alternatively, you can write to:  
Data Protection/Legal Services Dept  
App A Van Limited  
Park Farm Close,  
Folkestone, Kent  
CT19 5DU

When writing to the Legal Services Dept please provide; your full name and address and our reference number.

If you chose to e-mail us, please note we are unable to accept any liability for personal information or data which is lost or abused in transmission to us.

We will endeavour to update your marketing preferences as soon as we possibly can.

Although you have opted out of direct marketing, you will still receive service-related communications from us if we are still providing you with services.

## **Your rights**

Right to access to personal information

You have the right to obtain written confirmation from us whether your personal information is being processed by us or by a third party.

You have the right to access any personal information we hold.

Your subject access request must be made in writing to:

Data Protection/ Legal Services Dept  
App A Van Limited  
Park Farm Close,  
Folkestone, Kent

CT19 5DU  
or e-mail: appavan@appavan.co.uk

Upon receipt of the subject access request, we will ask you to provide sufficient information to prove your identity before any personal information is released to you.

If you make a subject access request through a third party, such as a solicitor, it will be the responsibility of the third party to provide evidence to demonstrate that they are entitled to act on your behalf. This can take the form of a power of attorney or an appropriate written authority.

Although there is no fee for meeting your request we reserve the right to charge a reasonable fee if, in our reasonable judgement the request is manifestly unfounded, excessive, or repetitive. Any fee charged will be based upon the administrative cost of providing the information.

We have one calendar month from the date of receipt of your request to comply.

If you request large amounts of information, we may ask you to specify in more detail the information you require.

### **Right to rectification**

You have the right to request that we rectify personal information which is inaccurate or incomplete. In the first instance contact your Move Coordinator in writing specifying the inaccurate or incomplete personal information. Provide them with the correct personal information and ask them to rectify it.

We are required to rectify the information within one month. This can be extended to two months if the request for rectification is complex.

If you feel that your request for rectification is not being dealt with, you can escalate your request to the Legal Services Dept at the address given above.

### **Right to erasure (to be forgotten)**

You have the right to request the deletion or removal of personal information where there is no compelling reason for its continued processing. Individuals have a right to have personal information erased and to prevent further processing in the following circumstances:

- Where the personal information is no longer necessary in relation to the purpose for which it was originally collected or processed;
- When you withdraw your consent for your personal information to be processed;
- When the individual objects to the processing and there is no legitimate interest for the personal information to be processed;
- Personal information has unlawfully been processed;
- Personal information must be erased on the order of the courts;

We may refuse to comply with your request for erasure if we are required to comply with a legal or statutory obligation or if the personal information will be required for the purposes of resolving a claim, complaint or in the defence of a claim or complaint.

### **Right to restrict processing**

You have the right to restrict the processing of your personal information in the following circumstances:

- Where you contest the accuracy of the personal information which is being processed. You can ask for the restriction to be put in place until you are satisfied that the inaccuracies' have been rectified;  
Privacy Policy May 2018 Page 8
- The processing of the information is deemed to be unlawful, but you do not want your personal information to be erased;
- The personal information is no longer required by us but you would like us to retain it to establish, exercise or defend a legal claim;

### **Right to object**

You have the right to object to the processing of your personal information related to direct marketing even if you have previously consented to your personal information being processed for that purpose.

If you object we will cease processing your personal information for marketing purposes as soon as we receive your written objection.

You can raise your objection at any time.

### **Changes to this policy**

We keep our privacy policy under regular review and will place any updates on our website. This current privacy policy was updated in May 2019.