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**TRUVELO UK LTD. PRIVACY POLICY**

	<b>Originated By</b>	<b>Review By</b>	<b>Approved By</b>
<b>Name</b>	D Robertshaw		
<b>Designation</b>	IT Manager	Director	Director
<b>Signature</b>			

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## Purpose

We are pleased to welcome you to the Truvelo (UK) Ltd website. In order for you to feel secure during your visit to our website, we would like to inform you about the processing of your data.

## Who we are

This website is operated by Truvelo (UK) Ltd. Truvelo (UK) Ltd offers a market-leading range of solutions, services and products in the fields of traffic speed enforcement, management, and measurement.

When "we" or "us" is used in this Privacy Policy, it refers to Truvelo (UK) Ltd and/or the affiliated companies of Truvelo (UK) Ltd.

## Scope

This Privacy Policy applies to all the personal information we collect about you as website visitor, customer, supplier, business partner or in general as an interested party to learn how we process your personal data.

Truvelo (UK) Ltd is responsible for the operation of this website.

Depending on the specific circumstances of data collection and processing, the responsible legal person for the processing of personal data within the meaning of Art. 4 (7) GDPR is Truvelo (UK) Ltd and/or the respective affiliated companies of Truvelo (UK) Ltd.

## Requests by e-mail/ contact form/ telephone/ post


Purpose of data processing/legal basis:

Personal information that you provide to us by e-mail, telephone, post or via the contact form on our website will of course be treated as confidential. We only use your personal information for a specified purpose in order to process your request. The legal basis for data processing is Art. 6 para. 1 b), c), or f) GDPR. A legitimate interest in data processing within the meaning of Art. 6 Para.1 f) GDPR on the part of our company arises from the interest to answer your requests as customers, business partners, etc. and thereby to maintain our business relationship and promote customer satisfaction.

For this purpose, when using our general contact form only your name, your telephone number and your e-mail address as well as country related information are required. Data you submit via an order form or other form, which is necessary for the fulfilment or initiation of a contractual relationship and therefore marked as mandatory entry field (\*), will also be processed. You may provide us with additional personal information but you are not required to do so.

Storage duration/ Criteria for defining the storage duration:

In principle, we store your personal data as long as it is necessary for the purpose for which it was collected. All personal data that you provide us through your requests will be deleted by us no later than 365 days after the final reply to you, or securely made anonymous. The 365 day storage period is due to the fact that it may happen that you contact us again after an answer on the same matter and we can then refer to the previous correspondence. Experience has shown that after 365 days there are usually no more questions about our answers.

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### **Processing of data of business partners**

Purpose of data processing/legal basis:

As part of our business relationship with you as our customers, business partners, suppliers, etc. we process personal data such as your name, address, e-mail address, telephone/fax number, tax number, customer number, bank account details and, if applicable, place or date of birth, nationality and credit rating data as well as other data which you have voluntarily provided to us. The processing is performed for identification purposes, as well as entering into a contract, execution, administration and processing of contracts, evaluation of creditworthiness and safeguards, preparation of statements and credit notes or reimbursements, administration and enforcement of claims, compliance with legal regulations, data security and customer service.

The legal basis for data processing is Art. 6 para. 1 b), c) and f) GDPR.

Storage duration/ Criteria for defining the storage duration:

We store your personal data as long as it is necessary for the purpose for which it was collected. As far as there are no deviating legal storage obligations, the storage of the data required in each case therefore always takes place for the duration of the business relationship with you and until the expiry of the applicable limitation periods for any claims resulting from the business relationship.

### **Data processing of contact persons**

Purpose of data processing/legal basis:

Our company processes personal contact information of contact persons on the side of customers, interested parties, suppliers and other business partners for communication by e-mail, telephone, fax and post. The legal basis for data processing is Art. 6 para. 1 b) or f) GDPR. The legitimate interest within the meaning of Art. 6 para. 1 f) GDPR arises from the interest to conduct or initiate the business relationship with customers, interested parties, suppliers and other business partners and to maintain personal contact with contact persons.


Storage duration/ Criteria for defining the storage duration:

Personal data are stored for the purpose of conducting business relations as long as there is a legitimate interest in them.

### **Data processing for marketing purposes**

Purpose of data processing/legal basis:

Truvelo (UK) Ltd uses personal data for marketing purposes, in particular for advertising by e-mail, telephone and post. The purpose of data processing within the framework of marketing measures is to inform those concerned about products and services of Truvelo (UK) Ltd. The legal basis for sending advertising by post is Art. 6 para. 1 f) GDPR. The legitimate interest arises from our interest in sending customers and interested parties information on products and services. The legal basis for marketing measures by e-mail or telephone is usually a declaration of consent submitted by you. Marketing measures towards existing customers (e.g. advertising by e-mail) may, under certain circumstances, also be permissible without prior consent on the basis of Art. 6 para. 1 f) GDPR.

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You can object from receiving marketing communications from us at any time with effect for the future by writing a message to [info@truvelouk.com](mailto:info@truvelouk.com).

Storage duration/ Criteria for defining the storage duration:

In principle, we store your personal data as long as it is necessary for the purpose for which it was collected. If you object from receiving marketing communications, we will stop processing data immediately and subsequently delete your data, unless they are also stored for other legally permissible purposes.

### **Other purposes for the processing of personal data**

Furthermore, we use personal data provided by you or collected from you - as far as legally permissible - for specific purposes which are stated at the time of the concrete data collection (e.g. on certain pages of our website).

### **Recipients and categories of recipients**

Disclosure of personal data within Truvelo (UK) Ltd:

It may be necessary for us to transfer your requests sent to us by e-mail, contact form, telephone or post, including the personal data contained therein, to other companies within the Truvelo (UK) Ltd Group, if this is necessary for the purposes of processing your request.

Furthermore, your data will be shared with other companies of the Truvelo (UK) Ltd Group for the implementation or initiation of a business relationship.

Within the Truvelo (UK) Ltd Group your data may be transferred to other companies of this group for marketing purposes.

Disclosure of personal data to third parties:


In principle, no data will be shared with other third parties outside Truvelo (UK) Ltd. We may only disclose your personal data to third parties if you have expressly consented to the transfer in advance, or if we are obliged to do so by law. The legal basis for this data processing is Art. 6 para. 1 a) GDPR in case of consent or Art. 6 para. 1 c) GDPR in case of a legal obligation.

Exceptionally, however, data are processed on our behalf by third party processors (i.e. we outsource personal data collected from us to external service providers). These contractors are carefully selected, audited by us and contractually bound according to Art. 28 GDPR (in particular on provision of suitable technical and organisational security measures).

We may also disclose your personal information if disclosure is necessary to protect vital interests, or where we are otherwise permitted by applicable laws or regulations.

We do not sell or license your personal information to third parties.

International data transfer:

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In order to fulfil the purposes mentioned under this Privacy Policy, we may transfer your personal information to recipients outside the European Economic Area (EEA). In those countries there might not apply the same standard of data protection as in the state in which you provided your personal data originally. This may for example be the case when data is shared with another corporation of the Truvelo (UK) Ltd Group, which is based in a non-EEA country.

Personal data will only be transferred to non-EEA countries under the following conditions:

- the transfer is made to a country where the European Commission considers that adequate protection of personal data is guaranteed, or
- appropriate measures have been taken to protect your data, in particular by contractual agreement on appropriate data protection measures or safeguards in accordance with the requirements of the European Commission or a data protection authority, or
- if you have consented to the transfer or
- the transfer is necessary for the performance of a contract between you and the person responsible or for the implementation of pre-contractual measures at your request, or
- there is another legal basis for the data transfer.

### **Use of our website**


The protection of your privacy is very important to us. For this reason, we have designed our website in such a way that it can be used anonymously. We use information that we receive and store during your visit to our websites exclusively for internal purposes and to improve the design of the websites. Exceptions apply if data processing is necessary to defend against and prosecute attacks that constitute criminal offences or impair the functionality of our website.

### **Usage of data**

When you visit our websites, so-called usage data is temporarily stored on our web server for statistical purposes as a protocol in order to improve the quality of our websites. This data set consists of

- the page from which the file was requested,
- the name of the file,
- the date and time of the query,
- the amount of data transferred,
- the access status (file transferred, file not found),
- the description of the type of web browser used,
- the IP address of the requesting computer, shortened by the last three digits.
- We use this information to enable access to our website, to control and administer our systems and to improve the design of our websites. These data are stored anonymously. The creation of personal user profiles is thus excluded. Data about individuals or their individual behaviour is not collected.

### **Cookies**

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Cookies are small files that are stored on a visitor's hard drive. They allow information to be stored for a certain period of time and to identify the visitor's computer. For better user guidance and individual service presentation, we use permanent cookies. We also use so-called session cookies, which are automatically deleted when you close your browser. You can set your browser so that it informs you about the placement of cookies. This makes the use of cookies transparent for you.

### **Encryption**

To protect your data from unwanted access, we use an encryption method on most pages. Your details are then transmitted from your computer to our server and vice versa via the Internet using 128-bit SSL encryption (Secure Socket Layer). You can recognize this by the fact that the lock symbol on the status bar of your browser is closed and the address line starts with https://.

### **No obligation to provide personal information**

Unless otherwise stated in the previous chapters, the provision of personal data is neither required by law or contract nor necessary for conclusion of a contract and you are hence not obliged to provide such data. In case you choose not to provide us with your personal information, we might not be able to respond to your request or provide you with the requested service, participating in an application procedure or in an event might not be possible.

### **Your rights**

Right of access (Art. 15 GDPR):

Pursuant to Art. 15 para. 1 GDPR, you have the right, to request confirmation as to whether personal data relating to you are processed and, if this is the case, to receive information about the personal data we hold about you as well as the information specified in Art. 15 GDPR.

Right to rectification and erasure (Articles 16 and 17 GDPR):

In addition, you have the right to have modify, correct or in general amend your personal information (Art. 16 GDPR).


Furthermore, you have the right to request the deletion of personal data concerning you (e.g. if the data is no longer required for the purposes pursued) if the conditions set out in Art. 17 GDPR are met.

Right to restriction of processing (Art. 18 GDPR):

You have the right to request the restriction of the processing (Art. 18 GDPR) of your personal data if one of the conditions set out in Art. 18 GDPR is fulfilled, e.g. if you have objected to the processing, for the duration of any examination of our right to data processing or in the event that personal data are no longer required for processing purposes but must continue to be reserved for the assertion, exercise or defence of legal claims.

A restriction on the processing means that the data in question may only be processed - apart from being stored - with your consent or in order to assert, exercise or defend legal claims, to protect the rights of another person or for reasons of an important public interest of the European Union or a Member State.

Right to data portability (Art. 20 GDPR):

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If automated data processing is based on your consent or processing is necessary for the fulfilment of a contract with you or for the implementation of pre-contractual measures that take place at your request, you have the right to receive the personal data you have provided and which concerns you in a structured, current and machine-readable format and to transmit this data to another controller without hindrance from the controller to which the personal data have been provided. You also have the right to request the direct transmission of this data by us to a third party if this is technically feasible.

Right of objection (Art. 21 GDPR):

If the data processing is based on Art. 6 para. 1 f) GDPR (data processing for the protection of legitimate interests), you have the right to object to the processing at any time for reasons arising from your particular situation. We will then no longer process the personal data unless there are demonstrably compelling reasons worthy of protection for further processing which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Right of withdrawal (Art. 7 para. 3 GDPR):

If the data processing is based on a consent pursuant to Art. 6 para. 1 a) or Art. 9 para. 2 a) GDPR, you can withdraw your consent at any time with effect for the future. However, such withdrawal shall not affect the lawfulness of data processing based on consent before its withdrawal.

**To exercise the aforementioned rights or in the event of open questions, please send us your request here:**

Truvelo (UK) Ltd  
 Brentford Business Centre  
 14 Commerce Rd  
 Brentford  
 TW8 8LG  
[info@truelouk.com](mailto:info@truelouk.com)

We will ask you to verify your identity and specify which kind of information you require. We will make sure that your request will be addressed in time and free of charge unless a disproportionate effort is required.

**Right to lodge a complaint with a supervisory authority (Art. 77 GDPR):**


In addition, you have the right to lodge a formal complaint with the respective data protection authority in your jurisdiction, if you believe that the processing of personal data concerning you violates applicable data protection regulations. In particular, the complaint may be lodged with a supervisory authority in the EU Member State of your place of residence, place of work or the place of alleged violation.

**Changes to this Privacy Policy**

We may change this privacy policy in order to comply with applicable legal requirement. The current privacy policy can be found on our website and we therefore encourage you to regularly check it for any changes.

**Responsible for data processing in accordance with art. 4 para. 7 GDPR in connection with visiting this website:**



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Truvelo (UK) Ltd  
 Brentford Business Centre  
 14 Commerce Rd  
 Brentford  
 TW8 8LG

**Email signature privacy add on:**

Your privacy is important to us. Please find our privacy policy and information according to Art. 13 GDPR at XXXXXXXXXX. If you have any questions, please feel free to contact us at [info@truelouk.com](mailto:info@truelouk.com)