

Fleet Claims Administration Limited T/A FCLG

Privacy Policy

About this policy

We believe your private information should be exactly that, private. In order to give you the best service possible, we do need to collect some personal information about you and this policy explains what we need and why we need it.

The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (the right to be forgotten)
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Fleet Claims Administration Limited T/A FCLG is registered with the Information Commissioners Office and our registration number is Z7028998.

Fleet Claims Administration Limited T/A FCLG operates as both a data controller, and a data processor. FCLG is the data controller for the processing activities described later on in this policy, which means we decide why and how your data is processed. Where we are carrying out activities on behalf of our client, we act as a data processor which means our client will decide how and why your information is processed.

This policy applies to anyone visiting our website and using our services, including portals.

Changes to this policy

We may update this policy from time to time so we would encourage you to review our privacy policy whenever you visit our site. If you have any questions or concerns, please email compliance@fclg.co.uk and we will be happy to assist you.

Data accuracy

If you believe any of the information we are holding is out of date please let us know and we will ensure it is updated.

What we collect

Because we offer many different services, we are required to collect different types of information depending on which service you use, some services require less information, others require a little more but rest assured, we would never request it unless we really need it.

The following list outlines the types of information we may require from you:

- Personal details such as your name, contact details (telephone, address and email address) and any historical details (for example, if you update your telephone number, we may keep a record of previous details provided).
- Your date of birth, gender and age (age is calculated from date of birth).
- Details of additional drivers who have validated their licence to drive your vehicle (if validating their licence to drive your vehicle).
- Details of additional passengers involved in accidents.
- Records of contact you have made with us, and we have made with you, including telephone recordings, emails and Live Chat.
- Your vehicle information (including make, model & registration).
- Information obtained from the DVLA including:
 - Driving licence status
 - Entitlements to drive
 - Endorsements
 - Driving offences (this may include criminal convictions).
- Details about your health or if you are considered vulnerable.
- Children's data is only collected if they are involved in a claim you are making. We will only collect this information from their legal guardian and we will need to keep a record of their legal guardians name & contact details too.
- Information about your computer and about your visits to and use of this website & portals (this may include your IP address, geographical location, browser type and version, operating system, referral source and website navigation paths).

If you do not wish to provide the information required to administer your account then we will not be able to provide you with the service required.

Why do we need your information?

Your information will be used to provide you with an efficient and easy to use service and we will never use your information for anything but the job in hand. Fleet Claims processes data on behalf of clients (your employer/vehicle provider) and this means that some information regarding claims history will be reported back to them upon request. Further details of what is done with this information will need to be requested from them directly.

We use your information to conduct the following activities:

- Handling a motor, personal or medical claim (whichever may be applicable to you).
- To validate your driving licence in order to confirm your eligibility to drive.
- To comply with legal and regulatory obligations & guidance.
- To provide analysis for our clients.
- To monitor our services and make improvements.
- For auditing our business operations.
- To develop new services and streamline existing ones.

Lawful basis for processing

Please see below for a description of how we use the information we are provided with along with the legal basis we rely on

Activity	Types of data	Lawful basis including basis for legitimate interests
Claims handling	Personal details including name, date of birth and contact details, details about health (if you choose to provide it, this may include injuries you have sustained in an accident), vehicle details, children's data (if involved in an accident).	Necessary for the performance of our contract
Driving licence validation	Personal details including name, date of birth and contact details. Driving Licence details including endorsements & convictions.	Necessary for the performance of our contract
Administering our website and business including live chat.	IP address, geographical location, browser type and version, operating system, referral source and website navigation paths.	Necessary for our legitimate interest and provision of services
Sending email or SMS relating to your claim	Mobile telephone number and/or email address.	Necessary for the performance of our contract & provision of services

<p>Sending email or SMS for identification in relation to accessing portals to prevent fraud and to keep our portals secure. Providing analysis/reports to clients</p>	<p>Mobile telephone number and/or email address. Name, contact details, vehicle details, claim details, driving licence validation details including details of entitlement to drive and DVLA driver codes.</p>	<p>Necessary for the performance of our contract, necessary to comply with legal obligations & for the provision of services Necessary for the performance of our contract</p>
<p>For Auditing our business operations</p>	<p>Any of the data collected.</p>	<p>Necessary for the performance of contracts, to comply with legal and regulatory obligations and for the provision of services.</p>
<p>To develop and streamline new and existing services</p>	<p>Any of the data collected.</p>	<p>Necessary for our legitimate interests and performance of contracts.</p>

How do we collect your information?

We will collect your details in one or more of the following ways:

- From you directly.
- From your employer.
- From the DVLA (we are also permitted to conduct KADOE enquiries in order to establish keeper details if a vehicle is involved in an accident but the keeper is unidentifiable at the time).
- From the our driver if you have given them your details at the scene of an accident.

How do we store your information?

Information security is really important to us, that's why we are ISO 27001:2013 certified. Your information is stored on in-house and cloud based servers which are regularly backed-up , protected by a market leading anti-virus tools and regularly patched to address emerging vulnerabilities. In-house servers are located in a secure, restricted area and only the necessary people have access in order to maintain them.

We have a comprehensive Information Security Management System (ISMS) framework in place which is regularly audited and monitored.

Who do we share your information with?

If you are using our fleet management services then we may need to pass your contact details over to an approved repairer to organise and discuss repairs to your vehicle. If you would rather we didn't pass these details on then it will become your responsibility to contact the repairer yourself which may delay the time it takes to get your claim resolved, we respect your wishes though so if you would prefer to opt out, just speak to one of our claims handlers and they'll be happy to advise you of the next steps.

We may be required to share information in regards to your claim and this may include sharing some information with the third parties, insurers and legal representatives involved in your claim.

From time to time we may be required to share some information with the DVLA, Solicitors and the Police – we would never give more information than what is required or requested.

If we feel that we need to share your information with anyone else regarding your claim with us, we will contact you first to discuss this and request permission to share.

We will not share your information with any third parties for the purposes of direct marketing and we do not sell data.

We utilise some IT systems and they may store data outside of the EEA, for any suppliers who this applies to, we ensure that due diligence is completed, standard contractual clauses are in place and that the data is protected adequately.

Access to your information

It is your right to know what personal data is stored about you, by us, at any time. All you have to do is make a subject access request and we will aim to respond in 14 working days, some requests may take longer but no longer than one month. In most cases, subject access requests are free, however, Fleet Claims Administration T/A FCLG does reserve the right to request a small fee or refuse the request, should it be manifestly unfounded or excessive.

There are some exemptions which means you may not always receive all of the information we process, this will usually be because some data may include information about another individual. In these cases, we may be able to send edited versions which do not contain any personal information about others, however, this will be assessed at the time taking both your rights and the other individuals rights in to consideration.

You can make a subject access request by telephone, in writing or by emailing compliance@fclg.co.uk. Please note, all subject access requests are responded to, where possible, electronically, if you wish to receive the information in a different format then you will need to make this clear at the time of request. If you would like further information regarding how to make a subject access request, your rights and ours, please visit <https://ico.org.uk/your-data-matters/your-right-of-access/>.

The right to be forgotten

Should you wish to have your data held by us erased, your reason for this must meet one of the following grounds:

- the personal data is no longer necessary for the purpose which we originally collected or processed it for
- If your consent was given but you have now changed your mind
- If there is no legitimate interest for us to continue processing your data
- If there is no lawful reason for us to have collected or processed your data
- If there is a legal requirement to erase

If we are able to process your request, if applicable, your driving history letter will be issued as part of the deletion process. Once you receive this letter you should keep it safe because we will be unable to reissue another once the deletion has been completed.

Automated decisions

For some clients, we provide a licence validation service. This system uses automatic decision making using information provided directly from the DVLA and in line with your employer/vehicle providers insurance requirements. These checks are completed on behalf of the vehicle provider (our client) and form part of a contractual requirement between the driver of the vehicle and vehicle provider. You do have the right to question how the decision was made, if you have any queries regarding this, please contact us using the details below.

Data Transfers

We use some third party IT service providers and due diligence is completed prior to use to ensure that they are GDPR compliant and their data security is up to standard.

We are unlikely to need to send any other data outside of the EEA, however, should this change, appropriate technical and organisational methods will be put in place to ensure your data remains secure, this notice will also be updated to reflect such changes.

Children's information

We do not provide services directly to children or proactively collect their personal information. However, we are sometimes given information about children while handling a claim. The information in the relevant parts of this notice applies to children as well as adults. We have made every effort to make this policy as clear as possible to ensure anybody over the age of 13 can read and understand it.

Making payments

Our web platform utilises SagePay who are audited annually under the Payment Card Industry Data Security Standard (PCI DSS) and is a fully approved Level 1 payment services provider, this is the highest level of compliance. This is extended to any card payments you make through our client portal. Fleet Claims have many PCI-DSS policies including a strict Clear Desk Policy to ensure that personal information is not collected or retained where or when it should not be.

Retention and destruction

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it. In most cases your data will be securely disposed of after 7 years however, if there is a legitimate purpose then we may need to store it for longer. If you would like to know how long we are likely to need to store your data, please email compliance@fclg.co.uk.

For driving licence validations, we are required to store the details of your validation for 6 years plus the current (7 years). Validations are valid for 3 years and you can withdraw your consent at any time however we are unable to delete the details of your validation until it has met the required retention period.

All paper based files are securely shredded using a third party confidential waste disposal company.

Usernames and Passwords

Access to some content on our website may be allowed (under a written agreement between you or your employer and Fleet Claims) and will require a username and/or password. Failure to provide personal information may prevent you from accessing website pages or features containing confidential information, products or services. By accessing and using our protected and secured web site(s), you agree to maintain the confidentiality of the username and password you selected to access such site(s) and consent to our Terms of Use. In order to protect your data, you should not share your login details with anybody.

Cookies

This website uses "cookies". A cookie is a small data file that a website can transfer to a your device to keep records of the visits to such site. A cookie contains information such as your username and password that helps us recognise the pages you have visited and improve future visits, but the only personal information a cookie can contain is the information that you provide yourself. A cookie cannot read data on your device or read cookie files created by other sites. Information stored in cookies may be encrypted, however, we do not store your payment card details in cookies. If you prefer not to accept a cookie, you can set your web browser (e.g. Microsoft Internet Explorer, Chrome etc) to warn you before accepting cookies or you can refuse all cookies by turning them off in your web browser. Access to some of our secured web

site(s) may require the use of cookies, which you must enable only cookies that get sent back to the originating server. Otherwise, you can still access most of the features on our web site even without accepting a cookie.

The Driving Licence Secure Zone areas of the website use session cookies for your security. These cookies are used to authenticate you as a user and prevent unauthorised access. The Driver Licence Validation System also uses session cookies, again for your own security; these cookies expire when you close your browser. None of the cookies used on this site are intrusive and only hold data which you have provided when completing a form on this website.

External Links

This website may provide links to other third party websites. Even if the third party is affiliated with us through a business partnership or otherwise, we will not be held responsible for the privacy policies, practices or the content of such external links. These links are provided to you for convenience purposes only and you access them at your own risk, we encourage you to read the privacy notices on the other websites you visit.

Further Information

If you require copies of our certifications or have any compliance related requests, we would be happy to answer any questions. Please email compliance@fclg.co.uk with your request.

For any further information you can contact Fleet Claims Administration Limited T/A FCLG in the following ways:

Fleet Claims Administration Limited T/A FCLG
Unit 2 Avonbury Business Park
Howes Lane
Bicester
Oxfordshire
OX26 2UA

Tel: 01869 247788

Email: info@fclg.co.uk

For details on how the DVLA handle your data, please follow visit the following link - <https://www.gov.uk/government/organisations/driver-and-vehicle-licensing-agency/about/personal-information-charter>

For details on how your employer handles your data, please contact them directly.