

Classic Tracker Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits any of our website(s), www.classic-tracker.co.uk and or www.classic-tracker.com ("The Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law. Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when using our services or when making a purchase from our on-line store. If you do not accept and agree with this Privacy Policy, you must stop using The Site or Services immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account"	means an account required to access and/or use either our Service or certain areas and features of The Site;
"Cookie"	means a small text file placed on your computer or device by The Site when you visit certain parts of The Site and/or when you use certain features of The Site. Details of the Cookies used by The Site are set out in section 13, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via The Site or operating as a client using the Service. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR");
"Service"	means a GPS/GPRS based global tracking service, incorporating alerts and notification upon unauthorised movement and power tampering. The Service is provided to clients on a subscription-based model whereby an annual or monthly subscription is required for clients to access the Service; and
"We/us/our"	means Classic Tracker Ltd., a limited company registered in England under company number 10538804, whose registered address is 71-75 Shelton Street London WC2H 9JQ United Kingdom

2. Information About Us

2.1 The Site and Service is owned and operated by Classic Tracker Ltd., a limited company registered in England under company number 10538804, whose registered address is 71-75 Shelton Street London WC2H 9JQ United Kingdom

2.2 Our Data Protection Officer can be contacted by email at dpo@classic-tracker.com, or by post at 71-75 Shelton Street London WC2H 9JQ United Kingdom

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of The Site and Service. The Site or Service may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- 4.1.1 The right to be informed about our collection and use of personal data;
- 4.1.2 The right of access to the personal data we hold about you (see section 12);
- 4.1.3 The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 14);
- 4.1.4 The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 14);
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

4.1.7 The right to object to us using your personal data for particular purposes; and

4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 14 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

Depending upon your use of The Site, we may collect some or all of the following personal and non-personal data (please also see section 13 on our use of Cookies and similar technologies and our Cookie Policy):

- 5.1 name;
- 5.2 business/company name;
- 5.3 contact information such as email address, postal address and telephone number and mobile number;
- 5.4 vehicle information such as vehicle registration, stored location, VIN/chassis number, vehicle features and distinguishing features, date of registration and insured value;
- 5.5 IP address;
- 5.6 web browser type and version;
- 5.7 operating system;
- 5.8 a list of URLs starting with a referring site, your activity on The Site, and the site you exit to.
- 5.9 a history of searches you have performed on The Site.

6. How Do We Use Your Data?

6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.

6.2 our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

- 6.2.1 Providing and managing your Account(s);
- 6.2.2 Providing and managing your access to The Site;
- 6.2.3 Personalising and tailoring your experience on The Site;
- 6.2.4 Supplying our Service to you;
- 6.2.5 Personalising and tailoring our Service for you;
- 6.2.6 Replying to emails and telephone enquiries from you;
- 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time using mechanisms provided);
- 6.2.8 Market research;
- 6.2.9 Analysing your use of The Site and gathering feedback to enable us to continually improve The Site and your user experience.

6.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email or through social media with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

6.4 Third parties (including Google and others) whose content appears on The Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

6.5 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

6.6.1 Personal data provided in connection with your account or the provision of services to you will be retained until:

6.6.1.1 You ask us to cancel your account; or

6.6.1.2 Two years after the last log-in has taken place on your account and there are no active email subscriptions.

6.6.2 Personal data provided in connection with direct marketing or newsletter subscriptions will be retained as long as your direct marketing subscription remains active and your consent is considered to be valid.

6.6.3 Personal data provided during communication with our customer support team either via email or live chat applications will be retained for two years after your most recent communication with us.

7. How and Where Do We Store Your Data?

7.1 We only keep your personal data for as long as we need to in order to use it as described above in section 6, and/or for as long as we have your permission to keep it.

7.2 Most of your data will be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).

7.3 Some of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using The Site and submitting information to us. If we do store data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:

7.3.1 Ensuring that any US based companies are Privacy Shield Certified and their Model Contract clauses fully meet the requirements under the GDPR.

7.4 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through The Site and the Service.

7.5 Steps we take to secure and protect your data include:

7.5.1 Using secure connections (HTTPS) when you access The Site.

7.5.2 Encryption of any data prior to being backed up.

7.5.3 Encryption of connections between data processing facilities.

7.5.4 Restrictions on who within our company can access your data.

8. Do We Share Your Data?

8.1 We may sometimes contract with third parties to supply services to you on our behalf. These may include payment processing, service delivery, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

8.2 We may compile statistics about the use of The Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

8.3 We may sometimes use third party data processors that are located outside of the European Economic Area ("the EEA") (The EEA consists of all

EU member states, plus Norway, Iceland, and Liechtenstein). Where we transfer any personal data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

8.4 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

9. What Happens If our Business Changes Hands?

9.1 In the event of company acquisition or buyout, any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

10. How Can You Control Your Data?

In addition to your rights under the GDPR, set out in section 4, when you submit personal data via The Site, you may be given options to restrict our use of your data.

11. Your Right to Withhold Information

11.1 You may access certain areas of The Site without providing any data at all. However, to use all features and functions available on The Site you may be required to submit or allow for the collection of certain data.

11.2 You may restrict our use of Cookies. For more information, see section 13 and our Cookie Policy.

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee would normally be payable and we will endeavour to provide any and all information in response to your request free of charge. Please contact us for more details using the contact details in section 2.

13. Our Use of Cookies

The Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of The Site and to provide and improve our services. By using The Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than us. Third party Cookies are used on The Site for integration of third party content and advertising services. In addition, The Site uses analytics services provided by Google Analytics, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use The Site. For more details, please refer to our Cookie Policy.

14. Contacting Us

If you have any questions about The Site or this Privacy Policy, please contact us. We would ask that please ensure that your query is specific to the terms of this policy or information about the data we hold about you (as under section 12, above).

15. Changes to our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on The Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of The Site following the alterations. We recommend that you check this page regularly to keep up-to-date.