



Privacy Policy

Welcome to InfraFleet and our website at www.infracfleet.co.uk. This Privacy Policy explains more about the purposes for which we and our partners use the Personal Data we collect from our customers, our website and other online visitors.

Who is responsible?

The person responsible in the sense of the UK's Data Protection Act ("DPA") and the EU's General Data Protection Regulation ("GDPR") is InfraFleet Ltd of 33 Holborn Street, 7th Floor, London, England, EC1N 2HT, UK ("InfraFleet", "we", "us", or "our"). If you have any questions or if you wish to exercise your rights, please feel free to email info@infracfleet.co.uk, to call us on +44(0)333 772 2788 or to write to us at the above address.

Principles of data processing

a) *Personal data*

Personal data is any information relating to an identified or identifiable natural person. This includes, for example, information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behaviour.

b) *Processing*

The processing of personal data (e.g. collection, retrieval, use, storage or transmission) always requires a legal basis.

c) *Legal basis*

In accordance with the DPA and the GDPR, we have to have at least one of the following legal bases to process your Personal Data: i) you have given your consent, ii) the data is necessary for the fulfilment of a contract / pre-contractual measures, iii) the data is necessary for the fulfilment of a legal obligation, or iv) the data is necessary to protect our legitimate interests, provided that your interests are not overridden.

d) *Retention*

Processed personal data will be deleted as soon as the purpose of the processing has been achieved and there are no longer any legally required retention obligations.

Data we collect

a) *Provision and use of the website*

When you call up and use our website, we collect the personal data that your browser automatically transmits to our server. This is technically necessary for us to display our website and to ensure its stability and security. In this sense, we collect the following data: i) IP address of the requesting computer, ii) Date and time of access, iii) name and URL of the file accessed, iv) website from which the access was made (referrer URL), v) browser used and, if applicable, the operating system of your computer as well as the name of your access provider. The legal basis is our legitimate interest.

b) *Hosting*

The hosting service used by us for the purpose of operating our website is [Webflow Inc.](#). In doing so Webflow processes inventory data, contact data, content data, usage data, meta data and communication data of customers, interested parties and visitors of our website and services, on the basis of our legitimate interests.

c) *Content Management System*

We also use the Content Management System (CMS) of Webflow to publish and maintain the created and edited content and texts on our website. This means that all content and texts submitted to us is transferred to Webflow. This represents a legitimate interest.

d) *Cookies*



Privacy Policy

We use so-called cookies on our website. Cookies are pieces of information that are transmitted from our web server or third-party web servers to your web browser and stored there for later retrieval. Cookies may be small files or other types of information storage. There are different types of cookies: i) Essential Cookies. Essential cookies are cookies to provide a correct and user-friendly website; and ii) Non-essential Cookies. Non-essential Cookies are any cookies that do not fall within the definition of essential cookies, such as cookies used to analyse your behaviour on a website (“analytical” cookies) or cookies used to display advertisements to you (“advertising” cookies).

As set out in the UK’s Privacy and Electronic Communications Regulations (“PECR”) and the EU’s Privacy and Electronic Communications Directive (“PECD”), we need to obtain consent for the use of Non-essential Cookies. For further information on the cookies we use, please refer to our Cookie Policy. The legal basis for processing is our legitimate interest and your consent.

e) Cookie consent

Our website uses a cookie consent management tool to obtain your consent to the storage of cookies and to document this consent. When you enter our website, the following Personal Data is transferred to us: i) Your consent(s) or revocation of your consent(s); ii) Your IP address; iii) Information about your browser; iv) Information about your device; v) Time of your visit to our website. The basis for processing is our legitimate interest.

f) Economic analyses and market research

For business reasons, we analyse the data we have on web and server traffic patterns, website interactions, browsing behaviour etc. The analyses serve us alone and are not disclosed externally and processed using anonymous analyses with summarised and or anonymized values. For this purpose we use [Google Analytics](#) as well as [Fastly](#). The legal basis is our legitimate interest and your consent.

g) Fonts

We have integrated Google Fonts by [Google](#). To enable the display of fonts, a connection to Google’s server is established when our website is accessed. This enables Google to determine which website sent the request and to which IP address the display of the font is to be transmitted. The integration is based on our legitimate interest.

h) Contacting Us

We offer you the opportunity to contact us using various methods. We collect the data you submit such as your name, email address, company name and your message in order to process your enquiry and respond to you. The legal basis is both your consent and contract.

i) When using our services

We process the Personal Data involved in your use of our services in order to be able to provide our contractual services. This includes in particular our support, correspondence with you, invoicing, fulfilment of our contractual, accounting and tax obligations. Accordingly, the data is processed on the basis of fulfilling our contractual obligations and our legal obligations.

j) When requesting our Brochures

We process and store the Personal Data provided in the request form (your name, email address, company name) solely for the purpose of processing and responding to your request and contacting you. In addition, your IP address is processed out of technical necessity and for legal protection. The legal basis for processing is our legitimate interest, the provision or initiation of a contractual service and your consent.

k) Administration, financial accounting, office organisation, contact management

We process data in the context of administrative tasks as well as organisation of our business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we



Privacy Policy

process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

l) Social Media

We are present on social media (currently [LinkedIn](#)) on the basis of our legitimate interest. If you contact or connect with us via social media platforms, we and the relevant social media platform are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The legal basis is our legitimate interest, your consent or, in some cases, the initiation of a contractual service, if any.

m) Links to other providers

Our website also contains - clearly recognisable - links to the websites of other companies. When you use a link from our website to a third-party website, such third-party websites may also set cookies or becomes aware of your IP address. This processing is not subject to this policy. The respective provider or operator of the pages is always responsible for the content of these pages. We recommend that you refer to the privacy policy on the relevant third-party website itself.

Data Security

We undertake to protect your privacy and to treat your personal data confidentiality. In order to prevent manipulation or loss or misuse of your data stored with us, we take extensive technical and organisational security precautions which are regularly reviewed and adapted to technological progress. These include, among other things, the use of recognised encryption procedures (SSL or TLS).

However, we would like to point out that, due to the structure of the Internet, it is possible that the rules of data protection and the above-mentioned security measures are not observed by other persons or institutions that are not in our area of responsibility. We have no technical influence on this. It is the user's responsibility to protect the data he or she provides against misuse by encrypting it or in any other way.

International transfers

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organisational measures to protect the Personal Data we transfer.

How we may share your Personal Data

We may share your Personal Data with our Business Partners for the purposes described in this Privacy Policy, including (but not limited to) conducting the services you request, or customising our business to better meet your needs. We share your Personal Data only with Business Partners who agree to protect and use your Personal Data solely for the purposes specified by us.

We may also disclose your Personal Data for any purpose with your consent or for law enforcement, fraud prevention or other legal actions as required by law or regulation, or if we reasonably believe that we must protect us, our customers or other business interests. Except as described above of which you will be informed in advance, we will not disclose your Personal Data.

What we do not do

- We do not request Personal Data from minors and children;
- We do not use Automated decision-making including profiling; and
- We do not sell your Personal Data.

Privacy rights

Under the DPA and the GDPR, you can exercise the following rights:



InfraFleet

Privacy Policy

- *Right to information*
- *Right to rectification*
- *Right to deletion*
- *Right to data portability*
- *Right of objection*
- *Right to withdraw consent*
- *Right to complain to a supervisory authority*
- *Right not to be subject to a decision based solely on automated processing.*

If you have any questions about the nature of the Personal Data we hold about you, or if you wish to exercise any of your rights, please contact us.

Updating your information and withdrawing your consent

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing or want to withdraw any consents you have given us, please contact us.

Access Request

In the event that you wish to make a Data Subject Access Request, you may inform us in writing of the same. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

Complaint to a supervisory authority

The Information Commissioner's Office (ICO) is the relevant authority in matters of data protection in the UK. You have the right to make a complaint at any time to the ICO (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO in the first instance.

Validity and questions

This Privacy Policy was last updated on Friday, 10th of September 2023, and is the current and valid version. However, from time to time changes or a revision to this policy may be necessary.

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