



DAWSONGROUP LIMITED

PRIVACY NOTICE

1. About this notice

- 1.1 This Privacy Notice explains how companies within Dawsongroup Limited's group of companies (together, "the **Group**", "**we**", "**our**" or "**us**") use any personal information that we may collect about you. The Group includes (inter alia) each of the following direct and indirect subsidiaries of Dawsongroup Limited: Alexena Limited, Dawsongroup International BV, Dawsongroup International Limited, Dawsongroup Bus and Coach Limited, Dawsongroup TCS Iberica S.L., Dawsongroup TCS (Ireland) Limited, Dawsongroup UK Limited, Dawsongroup Material Handling Limited, Dawsongroup Benelux BV, Dawsongroup Polska Sp. Zoo, Dawsongroup Temperature Control Solutions Limited, Dawsongroup Truck and Trailer Limited, Dawsongroup Vans Limited, Dawsongroup Environmental Civil Municipal Limited, Dawsongroup Finance Limited, Dawsongroup TCS France SARL, Dawsongroup TCS GmbH, Dawsongroup TCS (Austria) GmbH, Dawsongroup Energy Solutions Limited, Tectoniks Limited, Dawsongroup TCS Italy S.R.L., Dawsongroup Temperature Control Solutions LLC, Dawsongroup Temperature Control Solutions Limited (New Zealand), and Ventura Rental Limited.
- 1.2 This policy (and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following material carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.3 It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy notice supplements those other notices and is not intended to override them.
- 1.4 Our Legal Department is responsible for overseeing questions in relation to this privacy notice. If you have any questions, including any requests to exercise your legal rights, please contact the Legal Department using the details set out at the bottom of this privacy notice.

2. The personal data we collect

- 2.1 Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
- 2.1.1 **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- 2.1.2 **Contact Data** includes address (home, postal or other physical address), email address and telephone numbers.

- 2.1.3 **Financial Data** includes bank account and payment card details.
- 2.1.4 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- 2.1.5 **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- 2.1.6 **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- 2.1.7 **Usage Data** includes information about how you use our website, products and services.
- 2.1.8 **Telematics Data** includes location, mileage and vehicle usage information generated by telematics devices fitted to our vehicles, including information about the way in which a vehicle is driven.
- 2.2 Personal data does not include data where your identity has been removed or which not associated with or linked to your personal data (anonymous data).
- 2.3 Please note that where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services that you request). In this case, we may have to cancel a service you have requested but we will notify you if this is the case at the time.

3. **How we collect personal data**

- 3.1 We use different methods to collect data from and about you including through:
 - 3.1.1 **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, via our website or otherwise.
 - 3.1.2 **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy on our website www.dawsongroup.co.uk for further details.
 - 3.1.3 **Vehicle telematics information.**
 - a) Telematics devices may be fitted to the vehicles we lease. These devices record the location of the vehicle and generate related operational data, such as how the vehicle is being driven. We refer to devices that we provide as “Dawsongroup Telematics Devices”, and to devices provided by a third party at a customer’s request as “Third Party Tracking Devices”.
 - b) Information generated by these devices may be shared within the Group and, where appropriate, with the police, regulators and other relevant third parties. We may also hold and use telematics data in aggregated and anonymised form to demonstrate and

enhance our services, to carry out data analysis and for other business and commercial purposes.

- c) We rely on the devices to monitor the location and mileage of our vehicles and to assess the way in which they are driven. This information helps us to run our business more effectively and, where relevant, to support the management of our customers' fleets. By way of example, we use:
 - i) location data to establish which vehicles are available across our depots;
 - ii) mileage data to determine when a vehicle is due for routine servicing and maintenance;
 - iii) driving data to help us manage our fleet, improve efficiency and enhance the service we provide to customers; and
 - iv) driving data where an incident involving a vehicle occurs (for example, a road traffic accident), to support our own investigations and, where applicable, to assist our insurers in dealing with that incident.

Where a vehicle is hired to a customer, that customer may have direct access to the telematics data produced by the device and may use it for its own purposes, which can include identifying driver training needs and improving the efficiency of its fleet. If you are driving one of our vehicles on behalf of a business, please contact that business directly for details of how it uses this information.

- d) Where a customer requests it, a Third Party Tracking Device may instead be fitted. In that case, we handle any information collected by the device on the customer's behalf, and it is the customer that decides what information is captured. The device provider will make the tracking data available to both us and the customer. Responsibility for informing drivers that a Third Party Tracking Device is fitted to a hired vehicle, and for explaining how the resulting information will be used, rests with the customer.
- e) Our use of telematics data through Dawsonsgroup Telematics Devices is necessary for our legitimate interests in operating and safeguarding our vehicle fleet, managing our business efficiently, supporting our customers' fleet management, promoting safe driving and investigating incidents, provided that those interests are not overridden by your own interests, rights and freedoms. We carry out an assessment to balance these interests before relying on this basis, details of which are available on request.

3.1.4 Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources, such as credit reference agencies and Companies House.

4. How we use personal data

4.1 We will only use your personal data when the law allows us to. We may collect and process the personal data about you for the following purposes:

- 4.1.1 Ordering our products and services** – we will use your Identity, Contact, Financial and Transaction Data in order to register you as a customer and to process and deliver products and services to you, including the management of payments, fees and charges. This is necessary for the purpose of performing our contract with you.
- 4.1.2 Contacting us** – when you contact us with an enquiry or to request information, we will use your Identity and Contact Data to respond to you.

- 4.1.3 **Advertising, marketing and public relations** – we may use your Identity, Contact, Technical, Usage and/or Profile Data to form a view on what we think you may want or need, or what may be of interest to you and in doing so we will only send you information that is deemed relevant to your use of our products and services. This is necessary for our legitimate interests in growing and developing our business including our products and services. You will receive marketing communications from us if you have requested information from us or purchased products or services from us and, in each case, you have not opted out of receiving that marketing. We do not share your data with any company outside the Dawsongroup Group for marketing purposes. However, if in the future we decide to do so, then we will get your express opt-in consent before we share your personal data with any company outside the Dawsongroup Group for marketing purposes. You can ask us to stop sending marketing communications at any time by contacting us.
- 4.1.4 **Fault reporting** - if you contact us to report a fault with our website, we will use the Identity and Contact Data provided for the purposes of rectifying that fault in accordance with our legitimate interests.
- 4.1.5 **Recruitment** – personal data provided for an employment opportunity will be processed so as to allow us to process and evaluate the merits of that application in accordance with our legitimate interests.
- 4.1.6 **Administration** – we may use your Identity, Contact and Technical Data for the purpose of protecting our business and our website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data. This is necessary for our legitimate interest in running our business, the provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, and for compliance with our legal obligations.
- 4.1.7 **Website Analytics** – as you navigate our website, Technical and Usage Data may be collected automatically. We do this to find out things such as the number of visitors to the various parts of the website, and to help us to improve the content of the website and to customise the content or layout of the website for you, in accordance with our legitimate interests. This is necessary for our legitimate interest in defining types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.
- 4.2 We may also use personal data which you provide to us, where the law allows us to do so, as follows:
 - 4.2.1 To deal with and/or respond to any enquiry or request made by you prior to entering into any contract or agreement with us or as a result of such contract or agreement.
 - 4.2.2 Where we need to perform the contract we are about to enter into or have entered into with you.
 - 4.2.3 Where we need to comply with a legal or regulatory obligation, including the prevention of crime.
 - 4.2.4 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- 4.3 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new

purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

- 4.4 The Group will monitor, record, store and use all telephone (including conversations), email or other communications with you, in order to check any instructions given to us, for training purposes, for the prevention of crime and/or to improve the quality of our customer service.
- 4.5 Automated decision-making and profiling – we may analyse Telematics Data to assess vehicle usage and driving behaviour, and your Identity, Contact, Technical, Usage and Profile Data to form a view on the products and services that may be of interest to you. These activities involve profiling. We do not, however, take decisions based solely on automated processing that produce legal effects concerning you or similarly significantly affect you. If this position changes, we will update this notice and explain the safeguards and rights that apply.

5. Disclosure of personal data to third parties

- 5.1 Your personal data will only be disclosed to relevant Dawson Group employees that have a need for such access for the purpose for which it was collected. Your personal data will not be disclosed to any other individuals or other entities except in the following circumstances:
 - 5.1.1 On occasion, we may need to hire other companies to help us to serve you better and in some of these cases we may need to share personal data that is necessary to perform tasks for us, such as carrying out market research or issuing marketing materials.
 - 5.1.2 Your personal data may be shared with financial services organisations, such as companies which provide hire-purchase funding and banks providing such funding. This is for the purpose of securing such funding on your behalf. We may provide Contact Data to enable such financial services organisations to carry out necessary searches in order to enable them to make a funding decision for you.
 - 5.1.3 Where it is necessary for the performance of our contract with you, including where you have asked us to do so or where we need to take steps to enforce any contract which may be entered into between us.
 - 5.1.4 Where we are under a legal duty to do so in order to comply with any legal obligation.
 - 5.1.5 In order to protect the rights, property or safety of the Group, our employees and others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.
 - 5.1.6 If we or substantially all of our assets are acquired by a third party, in which case personal data that we hold about our customers will be one of the transferred assets.
- 5.2 We require all third parties that process personal data on our behalf to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Security

- 6.1 We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures

to safeguard and secure the personal data we collect. In addition, the access to and use of the personal data that we collect is restricted to our employees who need the personal data to perform a specific job role or activity. Where personal data is shared with third parties in line with this policy responsible measures are used to protect your personal data.

- 6.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- 6.3 The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access. We urge you to take every precaution to protect your personal data when you are on the internet.
- 6.4 Your personal data will be held and processed on secure servers located in the UK. Where we transfer any of your personal data to a country outside the UK (including to other companies within the Group established overseas), we will ensure that an appropriate safeguard is in place, such as the transfer being made to a country the UK has determined provides an adequate level of protection, or the use of the International Data Transfer Agreement or the UK Addendum to the EU standard contractual clauses. Further details of the safeguards we rely on are available from us on request.

7. Data retention

- 7.1 We will retain your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For example we will retain details of your customer order, including your personal data, for a period of seven years to enable us to deal with any follow-up communications from you or to ensure that we are in possession of all relevant papers in the event of a legal claim relating to the contract between us.
- 7.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 7.3 Details of retention periods for different aspects of your personal data are available in our Data Retention Policy which you can request from us by contacting us.
- 7.4 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Other websites and links

- 8.1 Our website may contain links to other websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third party websites and are not responsible for their privacy statements or for the content, accuracy or opinions expressed in such websites. We do not investigate, monitor or check third party websites for accuracy or completeness and the inclusion of any linked website on or through our website does not imply approval or endorsement by us of the linked website.

- 8.2 If you decide to leave this website and access these third party websites, plug-ins and/or applications you do so at your own risk. We encourage you to read the privacy notice of every website you visit.

9. Your rights

- 9.1 You have the right to:

- 9.1.1 **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 9.1.2 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 9.1.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 9.1.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.
- 9.1.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 9.1.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 9.1.7 **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the “unsubscribe” (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this

will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.

- 9.2 If you wish to exercise any of your above rights, please send a written request to us at the address listed at the end of this privacy notice, addressed for the attention of the Group Legal Department.
- 9.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 9.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 9.5 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. About this notice

- 10.1 This privacy notice was last updated on 1 July 2026 and historic versions can be obtained by contacting us.

11. Contact details

- 11.1 Questions, comments or requests about your personal data can be sent to our Legal Department at the following address:

Address: Dawsongroup Limited, Delaware Drive, Tongwell, Milton Keynes MK15 8JH

Email: legal@dawsongroup.co.uk

12. Complaints

- 12.1 You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.