



PRIVACY NOTICE DRIVER SERVICES

INTRODUCTION

Scania (Great Britain) Limited is committed to protecting and respecting your privacy.

Our Privacy Notice explains the data we collect about you when you interact with us. It gives you detailed information about what we do with your data and how we keep it safe.

This Privacy Notice may change over time. Please refer to the Privacy Notice on our website as that will be the current version ([Link to Privacy Notice](#)).

We use abbreviations in this Privacy Notice:

Contact Information means your name, business name, address, telephone numbers and email addresses.

Information means Personal Data as defined by the GDPR

Licence Information means the information found on your driving licence including your name, address, date of birth and photograph.

Vehicle Identification Information means registration number and chassis number;

Vehicle Generated Information means:

- (i) performance data such as vehicle components, fuel consumption, brake usage, gear shifting, battery usage, engine data and error codes; and
- (ii) geographic position; and
- (iii) in-vehicle entertainment information

WHO IS SCANIA?

A data controller (“Controller”) is the company that decides why and how your Information is processed i.e. how it is collected and used.

When you deal with us, the Controller of your data is Scania (Great Britain) Limited. There may be exceptions to this and if there are, we will bring those to your attention.

Where this Privacy Notice refers to “we”, “our” or “us” below, unless it mentions otherwise, it’s referring to Scania (Great Britain) Limited as the Controller.

HOW WE PROCESS YOUR INFORMATION LEGALLY

The law allows us to collect and process your Information in certain circumstances:

1. With your CONSENT
In specific situations, we will seek your consent to collect and process your Information. When we seek your consent, we will make clear to you how we would like to use your Information so that you can make an informed decision about whether to allow us to collect and use your Information.
2. Where we have a CONTRACTUAL OBLIGATION
We may need your Information to comply with our contractual obligations to you. We may also require your Information where we take steps towards entering into a contract with you.
3. Where we have a LEGAL OBLIGATION



If the law requires us to, we may collect and process your Information.

4. Where it is in ours, or someone else's, LEGITIMATE INTEREST
- In certain circumstances we may collect and use your Information where it is reasonable for us to do so in the interests of our business operations and where we consider that doing so will not materially impact your rights, freedom or interests. This means we may use your Information in a reasonable way (that you might expect) but only where we consider this will not cause you any excessive or unnecessary risk.

THE INFORMATION WE COLLECT AND WHY

Driver Services

When you receive driver services from us, we may collect and create the following information about you, which may amount to Personal Data:

- Name;
- Contact Details;
- Driver Licence Information;
- Licence entitlement check information;
- Vehicle Generated Information;
- Test results;
- Training information workbook;
- Your employer and job title (where applicable);
- Records of your contact with us, including queries, requests and complaints;
- Our vehicles are fitted with forward facing cameras which record audio.

1. We may use your Information to:
 - 1.1. deliver contracted services to you;
 - 1.2. engage and communicate with you when you make an enquiry with us, and when you wish to purchase a driver training service on the basis of our contractual obligation to you or your employer;
 - 1.3. where you have requested a credit account, we may use your Information to conduct a credit check. We do this on the basis of our legitimate interest to ensure the affordability of extended credit;
 - 1.4. retain records to evidence our agreement with you. We may do this on the basis of a legal or contractual obligation, or our legitimate interest where we retain records for the purposes of defending or pursuing any future legal claim; and
 - 1.5. we use forward facing cameras to provide evidence of training for complaints and queries, to help enhance our training delivery, to provide evidence in the event of collision or incident, to challenge test failures, to safeguard our staff, customers and drivers and to ensure high quality and consistent training.
2. If you represent a limited company or incorporated partnership, we may use your Customer Relations Account Information to inform you about relevant products and services, including special offers, discounts, promotions, events etc. We do this on the basis of our legitimate interest to promote our products and services. You are free to opt out of marketing communications from us at any time. Please see the section "How to stop us direct marketing to you".
3. If you are an individual, a sole trader or an unincorporated partnership, we may use your Customer Relations Account information to inform you about relevant products and services including tailored special offers, discounts, promotions, events,



competitions and so on. With your consent, we will use your Customer Relations Account information to keep you informed by email and by other electronic communication methods such as text message. We may also market to you by mail or telephone on the basis of our legitimate interest to promote our products and services. We do not need your consent to market to you in this way but you are free to opt out of marketing communications from us at any time. Please see the section “How to stop us direct marketing to you”.

4. Vehicle Generated Information will be used for driver coaching services for our trainers to analyse to help deliver tailored training to drivers. This is done on the basis of our contractual obligation to you.
5. We may also collect your information in certain other circumstances:
 - 5.1.1. When you make a credit or debit card purchase with us we will process your payment card information. We do not hold your long card number. It is used by our payment processing partner only in the moment the payment is processed. We ensure your payment card information is secured to Payment Card Industry Data Security Standards. We retain for our records your payment method, card type and the last 4 digits of your payment card. We process this Information on the basis of our legitimate interest to prevent fraudulent transactions. This also helps to protect our customers from fraud. If we discover any criminal activity or alleged criminal activity through our use of suspicious transaction monitoring, we will process this Information for the purposes of preventing or detecting unlawful acts.
 - 5.1.2. When you enter our website, our web servers may store details of your browser and operating system, the website from which you visit our website, the pages that you visit on our website, the date of your visit, and, for security reasons, e.g. to identify attacks on our website, the Internet Protocol (IP) address assigned to you by your internet service provider. We collect some of this Information using cookies. Please visit the ‘Cookies’ section of this Privacy Notice to learn more.
 - 5.1.3. When you fill in any forms, for example, if an accident happens on any of our premises, we may collect your Information.
 - 5.1.4. When a third party provides us with your Information, for example, businesses within the Scania Group may provide us with your Information. Where your Information is received by us and you have not received a copy of this Privacy Notice, we will contact you to inform you that we have received your Information, what Information we have received and how we may use that Information.
 - 5.1.5. From publicly available sources (such as the Vehicle and Operator Services Agency) when you have given your consent to share Information or where the Information is made public.
 - 5.1.6. When you use our car parks and premises we may have CCTV systems operated for our security and yours. These systems may record your image and number plate during your visit. We do this on the basis of our legitimate interest to protect our customers, premises, staff and assets from crime. If we discover any criminal activity or alleged criminal activity through our use of CCTV, we will process this Information for the purposes of preventing or detecting



unlawful acts.

6. We may also use your Information in the following circumstances:
 - 6.1.1. To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate interest to improve our product offerings to customers.
 - 6.1.2. To comply with our contractual or legal obligations to share Information with law enforcement.
 - 6.1.3. To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to send these communications to help improve our products and services.

WHO WE SHARE YOUR INFORMATION WITH

1. We understand that your privacy is important and that you trust us to look after your Information. We will never sell your Information.
2. We may share your Information with carefully chosen third parties that we trust in order to deliver the driver services.
3. When Information is shared with a third party, we will apply a policy to help keep your Information safe:
 - We will provide only the Information they need.
 - They may only use your Information for the purposes we specify.
 - We will work closely with them to ensure that your privacy is respected and protected at all times.
4. We will not share your Information without good reason. Below are some of the categories of third parties who we may share your Information with:
 - i. Group Companies
We may share your Information with other companies within the Scania Group.
 - ii. Our Scania Dealer Network
We may share your Information within the Scania Dealer Network. The Scania Dealer Network consists of over 60 Scania Dealerships across the UK. Some of the dealerships belong to us (Scania (Great Britain) Limited) and some of the dealerships belong to our franchisees, operating according to Scania Dealer Operating Standards. Together we form the 'Scania Dealer Network'. The companies within the Scania Dealer Network (and links to their own privacy policies, where available) are:
 - Haydock Commercial Vehicles Limited
 - TruckEast Limited
 - West Pennine Trucks Limited
 - Graham (Commercials) Limited
 - Keltruck Limited
 - Road Trucks Limited
 - Pip Bayleys Limited



Granco Limited
S.J.Bargh Limited

iii. Our Suppliers and Service Provider

We may share your Information with our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf.

Category	Industry	Sector	Location
Medical providers – we may share your information in order to book your medical assessment for licence acquisition	Health	Health	EU
DVSA – we will book tests through the DVSA website	Government Regulatory Agency	Government Agency	EU
Theory Test Providers	Services	Automotive	EU
Drivers	Services	Automotive	EU
Credit Reference Agencies	Financial Services	Credit Agencies	EU
Marketing Agencies	Media	Advertising	EU
Insurers	Financial Services	Insurance	EU
IT Service Providers	Information Technology	IT Software and Services	EU & USA
Fuel Card Services	Financial Services	Consumer Finance	EU
Survey Providers	Professional Services	Research and Consulting	EU & USA
Market Researchers	Professional Services	Research and Consulting	EU
Driver Trainers	Services	Automotive	EU
Institute of Advanced Motorists	Regulated body	Automotive	EU

iv. Other third parties

We may also share your Information if we're under a duty to disclose or share it in order to comply with our legal obligations, to detect or report a crime, to comply with our tax obligations, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our staff and customers. In these circumstances, your Information may be shared with the Police, HMRC, DVLA, VOSA or other registered bodies.

HOW LONG WE KEEP YOUR INFORMATION

1. Whenever we collect or process your Information, we'll only keep it for as long as is necessary for the purpose for which it was collected and to defend any potential claims. At the end of that retention period, your Information will either be deleted completely or anonymised. We may use your data in an anonymised way (so you cannot be identified) for statistical analysis and business planning.



1. Sometimes we may share your Information with third parties and suppliers outside the European Economic Area (EEA), such as the USA. We may transfer Information that we collect from you to third-party data processors in countries that are outside the EEA. The table describing our Suppliers and Service Providers above will provide more detailed information about when this may occur.
2. If we do this, we have policies in place to ensure your data receives the same protection as if it were being processed inside the EEA.

HOW WE KEEP YOUR INFORMATION SAFE

1. We use technical and organisational security measures to protect the Information supplied by you and managed by us against manipulation, loss, destruction, and access by third parties. Our security measures are continually improved in line with technological developments.
2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Information, we cannot guarantee the security of your Information whilst in transit to our website and any transmission is at your own risk.
3. Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping this password confidential. We ask you not to use the same password as on other accounts and not to share your password with anyone.

WHAT ARE MY RIGHTS OVER MY INFORMATION?

1. You have several rights afforded to you under data protection laws. You have the right to:
 - request access to the Information we hold about you, free of charge in most cases;
 - ask for the correction of your Information when it is incorrect, out of date or incomplete;
 - be 'forgotten' and that we delete your Information where we no longer need to process it;
 - request that we stop using your Information in a particular way;
 - request that we stop using your Information for direct marketing;
 - withdraw consent that you have previously provided and we must stop using your Information for that purpose;
 - object to any processing that we undertake on the grounds of legitimate interest; and
 - request that we transfer your Information to another 'controller' (e.g. an alternative service provider).
2. You have the right to request a copy of the Information we hold. Where any Information we hold is inaccurate, you can request that it is changed. To ask for your Information, please contact GDPR@scania.com. To ask for your Information to be



amended, please contact your local depot or contracts manager.

3. You may ask that we delete your Information and we must do so where we no longer have a reason for holding your Information. Whenever you have given us your consent to use your Information, you have the right to change your mind at any time and withdraw that consent. We must then delete your Information if we have no other reason for holding your Information.
4. You have the right to request that we temporarily stop using your Information in a certain way. This right applies where:
 - you think the Information we hold is inaccurate;
 - you think we are processing your Information illegally;
 - we no longer require your Information but you may require it for legal reasons; or
 - you have objected to us processing your Information (see below) and you await a response from us.
5. Where we are processing your Information on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your Information.
6. You have the right to stop the use of your Information for direct marketing activity through all channels, or selected channels. We must always comply with your request. See section: How to stop us direct marketing to you.
7. If we choose not to action any request from you, we will explain to you the reasons for our refusal.
8. We may ask you to provide evidence of your identity before we process any request. This is to ensure your Information security.

HOW TO STOP US FROM DIRECT MARKETING TO YOU

1. You can stop receiving marketing emails from us at any time by clicking the 'unsubscribe' link at the bottom of our emails.
2. We will stop all direct marketing to you if you email your request to GDPR@scania.com.
3. Please note that you may continue to receive communications for a short period after changing your preferences whilst we process your request.

CONTACTING THE REGULATOR

We encourage you to get in touch with us directly in the event of any query or complaint at GDPR@scania.com, or by calling 01908 210 210 and asking for the Legal, Risk and Compliance department, and we will do all we can to resolve any issue you may have. However, if you feel that your Information has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your Information, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113.

CHANGES TO THIS PRIVACY NOTICE

Version



This Privacy Notice may change. If it does, we will post an updated version on our website. If the changes are material, we may contact you by email to let you know. If you do not agree with the changes, you must notify us immediately at GDPR@scania.com and stop using our services. Changes will take effect 7 days after the updated Privacy Notice is uploaded. We recommend that you review this notice from time to time on our website.

CONTACT US

If you have any questions, suggestions or complaints about the processing of your Information or wish to contact us to amend/update your marketing preferences, please contact us using the details below:

GDPR@Scania.com
Scania (Great Britain) Limited
Compliance, Legal and Risk

Delaware Drive
Tongwell,
Milton Keynes
MK15 8HB

Or call 01908 210 210 and ask for the Compliance, Legal and Risk department.