

# **Privacy Policy**

**Privacy Policy RED DRM Ltd**

**NOVEMBER 2020 V.2**

## PRIVACY POLICY

Respecting the privacy rights of our customers is very important to us. We are committed to complying with the Data Protection Act 1998 and, when it comes into force, the General Data Protection Regulation 2016/679. This privacy policy explains how we collect, store and use personal data about you when you visit our websites ( <https://www.reddrivingschool.com/driver-risk-management/>, [www.nfegroup.co.uk](http://www.nfegroup.co.uk), [www.automotional.com](http://www.automotional.com), [www.performanceondemand.co.uk](http://www.performanceondemand.co.uk),) and our mobile, tablet and other applications (our “Sites”). This policy applies to all our Sites regardless of how they are made available to you or accessed by you.

Please read this privacy policy carefully before you start using our Sites, as this policy will apply to your use of our Sites.

By accessing, browsing and using our Sites, you confirm that you accept this privacy policy. If you do not want your data to be used as set out in this privacy policy, you should not use our Sites. However, you do not have to consent to any of our marketing in order to use our Sites or receive our products. If you have consented to direct marketing but have subsequently changed your mind, please email [info@redtraining.com](mailto:info@redtraining.com) to opt out.

Your use of our Sites, including any orders you place, is governed by our [Terms and Conditions of Sale](#). Please take the time to read these, as they include important terms which apply to you.

### WHO ARE WE?

The data controller of our Sites is RED DRM Limited (“we”, “us” or “our”) of (Unit 3a, Western Paddock, Donington Park, Castle Donington, Derbyshire, DE74 2BN). If you have any questions about how we treat your personal data, please contact the Data Protection Officer at RED DRM Head Office, Unit 3a, Western Paddock, Donington Park, Castle Donington, Derbyshire, DE74 2RP or via email to [info@redtraining.com](mailto:info@redtraining.com).

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### WHAT INFORMATION DO WE COLLECT AND WHY DO WE COLLECT IT?

When you visit our Sites, we may collect:

Information such as your computer’s IP address, browser type and version and anonymous information collected from cookies when you are browsing our Sites. We collect this information to help us understand how to improve our services and our Sites and to ensure that the content on our Sites is presented to you in an effective manner. We have a legitimate business interest for this processing: to ensure that our Site is operating effectively and to provide you with a great service. Personal information such as your name, address, phone number, date of birth, driving licence number and email address as provided by you when you register to or place an order with us and enter your payment card details. We collect this information for the following reasons:

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- To process your order. We engage third party processors to process the payment of your order. We collect this information to perform a contract with you and, if you fail to give us the information that we request, then you may not be able to place an order. If you consent to them doing so, the third party processors (PayPal, Global Payments) may store your payment card details to speed up your transaction time.
- For product development (for example, call backs for feedback on new products), for statistical, market research, testing and survey purposes, to notify you about changes to our Sites or our services. We have a legitimate business interest to collect this information: to continue to improve the services we provide to you;
- To ensure you receive marketing and offers that are of most interest and relevance to you.
- Information that you provide to us when requesting a Quick Quote (including your name, email address, company name (if provided) and contact phone number)
- Information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address)

### USING YOUR PERSONAL INFORMATION

#### What have I consented to?

We will not send direct marketing messages to you unless you have opted-in to our marketing. If you have opted-in, this means that we may contact you via email or phone.

- with offers about our products;
- to deliver relevant, tailored advertising to you with information about products or services we feel may interest you.
- Administer our website and business
- Personalise our website for you
- Enable your use of the services available on our website
- Send you information or prices requested
- Send you non-marketing commercial communications
- Send you email notifications that you have specifically requested
- Send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter)
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#### Can I withdraw consent?

You are always free to opt-in to our marketing and you are always free to opt-out at anytime; this will never have an impact on our commitment to provide you with great service and a quality product. To withdraw consent to marketing, please [click here](#). We will stop sending you marketing messages as soon as possible but, in any event, will do so no later than 30 days from your request to withdraw consent.

#### How long do you keep my consent?

We will remove your details from our systems for marketing purposes once your account is closed and destroy any associated papers once our legal/accounting obligation to keep them has expired.

This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and

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deletion of personal information. Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Notwithstanding the other provisions of this Section, we will retain documents (including electronic documents) containing personal data; to the extent that we are required to do so by law; if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

### Updating your consent

From time to time we may ask you to update your consent to make sure that you are still happy to receive marketing communications. If you are presented with an opt-in box and choose not to receive marketing communication from us on some or all media, we will update our records accordingly.

## **WHO DO WE SHARE YOUR INFORMATION WITH?**

We may share your personal information with a purchaser or a potential purchaser of our business. We have a legitimate business interest to do this: to assist with the sale or potential sale of our business.

We may also share your information with 3<sup>rd</sup> party service providers in order to facilitate your order or service.

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy or the services we provide.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other legal or regulatory enforcement agency has asked us for it.

We require all third parties that we work with to treat your personal information as confidential and to fully comply with all applicable UK and Ireland data protection and consumer legislation.

## **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") pursuant to: (a) the model clauses published by the European Commission pursuant to Commission Decision C(2010) 593 Standard Contractual Clauses (Processors) and a copy of the model contract clauses is available [here](#); or (b) Where we transfer or store personal data in the United States, the US Privacy Shield Regime. It may also be processed by selected third parties operating outside the EEA engaged in, for example, the processing of your payment details. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

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Information that we collect will not be transferred outside the European Economic Area without ensuring that the personal information is protected to an equivalent standard.

Unfortunately, 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 any data transmitted to our Sites and any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. All information you provide to us is stored on our secure servers. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and corporate policies to safeguard and secure the information we receive.

### **HOW TO GET COPIES OF OR AMEND THE INFORMATION WE HAVE COLLECTED**

You may request details of personal information which we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you, please contact us at [info@redtraining.com](mailto:info@redtraining.com) or write to us at RED DRM , Unit 3a, Western Paddock, Donington Park, Castle Donington, Derbyshire, DE74 2RP for the attention of the Data Protection Officer.

If you think any information we have about you is incorrect or incomplete, please write to us or email us and we will correct or update any information as soon as possible.

### **LINKING**

We may link to other websites which are not within our control. Once you have left our Sites, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement applicable to the website in question.

### **PASSWORDS**

You are required to create a password when you register an account with us. Creating a secure password is one of the best ways of keeping your information safe and you can change this at any time by logging into your account.

You should never write your passwords down anywhere, or share them with anyone, including close family members.

Although it may be tempting to use the same password if you have more than one online account on different websites, it is far more secure to have a different and unique password for each online account you have. This reduces the chances of all your accounts being accessed if one of your passwords is compromised.

You should also regularly change your password to improve the security of your online account.

Similarly, if you ever have any suspicions that someone may have accessed your account, you should immediately change your password.

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You can re-set your password on our websites any time by logging into your account and selecting the 'change my password' option.

If you've forgotten your password, enter your email address on the 'forgotten your password' page and we'll send you an email. Simply follow the instructions in the email to change your password.

### **CHANGES TO OUR PRIVACY POLICY**

Any changes we make to this Privacy Policy will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

### **HOW TO CONTACT US**

If you have any questions about our Privacy Policy, please contact the Data Protection Officer RED DRM , Unit 3a, Western Paddock, Donington Park, Castle Donington, Derbyshire, DE74 2BN or via email to [info@redtraining.com](mailto:info@redtraining.com)