

Unipart Rail Limited Privacy Notice

Welcome to Unipart Rail's Privacy Notice.

We respect your privacy and are committed to protecting your personal information. This Privacy Notice explains what we do with your personal information when you make contact with us or use one of our services.

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About Unipart Rail and this privacy notice

This privacy notice tells you how Unipart Rail (also referred to as “Unipart”, “we”, “us” or “our”) processes your personal information. This includes any personal information we will collect about you whenever you:

- a) Use our website or contact us;
- b) Are a client or customer;
- c) Are a visitor to one of our offices;
- d) Are a supplier of goods or services to us.

Personal information is any data that can be used to identify a living person, such as your name, address and contact information.

Unipart Rail is the data controller processing your personal information, unless otherwise stated.

You can contact us by phone, email or post; see details on www.unipartrail.com.

Personal information we use

We will process various different kinds of personal information. This includes personal information you provide to us and personal information we create about you.

The table below outlines the type of personal information we process and how we collect this information.

Category of data	Description	Source/collection method
Identity	First name, last name, title.	Correspondence by post, email or phone. Includes contact forms, making a complaint, subscriptions to services or publications. Direct interactions such as visits to Unipart sites, attendance or speaking at one of our events or exhibitions. We may also collect additional information from publicly available sources, and the personal data of business contacts from their respective employers.
Contact	Billing address, delivery address, email address and telephone numbers.	Correspondence by post, email or phone. Includes CVs, contact forms, making a complaint, subscriptions to

		<p>services or publications.</p> <p>Direct interactions such as visits to Unipart sites, attendance or speaking at one of our events or exhibitions.</p> <p>We may also collect additional information from publicly available sources.</p>
Profile	Interests, preferences and feedback.	Correspondence by post, email or phone. Includes CVs, contact forms, making a complaint, subscriptions to services or publications.
Image	CCTV footage, photos, video footage.	Visitors to Unipart sites and guest or client events.
Marketing and Communications	Marketing preferences, including third party marketing opt-in consent.	Correspondence by post, email or phone. Includes contact forms, making a complaint, subscriptions to services or publications.
Usage	How you use this website, products and services.	Cookies, server logs and other automated technologies or interactions.
Technical	IP address, browser type and version, time zone setting and location, browser plug-in type and version, operating system and platform and other technology on the devices you use to access this website.	Cookies, server logs and other automated technologies or interactions. Analytics providers, such as Google
Transaction	Record of payments made to and from you, details of products and services you have purchased from us or one of our clients.	Purchasing a product or service and third party client reports.
Job Applicants	CVs, applicant correspondence.	<i>Link to Privacy Notice for job applicants</i>

Our website, goods and services are not intended for children and we do not process children's personal information for profiling, automated decision making or marketing purposes.

We may occasionally collect children’s personal data during the following activities:

- a) Educational events with schools and academies;
- b) On CCTV when children visit Unipart sites.

Data collected from children will only be the minimum required to support the specified activity .

Where events involving children include filming and/or photography, we will follow the school or academy safeguarding policies at all times and otherwise in compliance with data protection and other applicable laws.

How we use personal information

We process personal information for a variety of different purposes. We will only process personal information where we have a lawful basis for doing so under the applicable data protection legislation.

In summary, the relevant lawful bases are:

- a) Performance of a contract: the processing of the personal data is necessary in relation to a contract or agreement which you have entered into with us or because you have asked for something to be done so you can enter into a contract or agreement with us.
- b) Legitimate interests: processing is necessary for the legitimate interests pursued by Unipart Rail and other organisations in the Unipart Group;
- c) Compliance with a legal obligation: processing is necessary to comply with our legal obligations;
- d) Consent: we will only process your personal data for a specific purpose that you consented to. Where we are relying solely on consent as the basis for processing your personal data, we are required to ensure it is express and informed consent and to obtain, and keep records of your consent. You can modify or withdraw this consent at any time by notifying us in writing, although this may affect the extent to which we are able to interact with you in future.

The table below sets out the lawful bases we use to process personal information.

Purpose/Activity	Lawful basis for processing
General Enquiries / Registering a new customer or client.	Performance of a contract and legitimate interests - we need to process your personal information to provide products and services.
Recording visitor’s identity and contact details, including CCTV monitoring.	Compliance with a legal obligation and legitimate interests - we may need to process personal information to protect our business and comply with our

	legal obligations, including crime prevention and health & safety.
Processing and delivering orders, including: a) Payments, fees and charges b) Collecting and recovering money owed to us.	Performance of a contract and legitimate interests - we need to process your personal information to provide or receive products and services.
Managing relationships, which will include notifying you about changes to our terms, general record keeping or privacy notice.	Compliance with a legal obligation & legitimate interests - we need to process personal information to comply with our legal obligations, to keep our records updated and study how you use our products and services so we can enhance them.
Administering and protecting our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Compliance with a legal obligation & legitimate interests - we may need to process personal information to comply with our legal obligations, including fraud prevention, and to run our business.
Delivering relevant website content and advertisements to you and measure or understand the effectiveness of the advertising.	Legitimate interests - we will process your personal information to study how you use our products and services, to develop them and grow our business, and to inform our marketing strategy. Consent - when you request a copy of our newsletter, we use your personal data for sending a copy to you.
Using data analytics from Google Analytics and other analytics service providers to improve our website, products/services, marketing, customer relationships and experiences.	Legitimate interests - we will process personal information to define customer types, keep our website updated and relevant, to develop our business and inform our marketing strategy.
Making suggestions and recommendations about goods or services that may be of interest to you	Consent, Legitimate interests - we have a legitimate interest to market our products and services to existing and prospective customers and we may need to process personal information to do this.

	You have the right to opt out from receiving direct marketing at any time, please see the 'Marketing' section for more information.
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Marketing

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising, for instance by providing an unsubscribe button in all email marketing communications. You can also contact us at any time to update your marketing preferences by telephone or email.

Promotional offers from Unipart Rail

We may use your personal information to tailor our marketing communications so that you only receive promotional offers that may be of interest to you. You will only receive marketing communications from us if you have subscribed to marketing communications or where we have a pre existing relationship with you.

The lawful basis for processing your data for this purpose is legitimate business interest.

Third party marketing

We may share your personal information with external third parties for marketing purposes, these companies would not be entitled to sell your data or use it for other purposes, other than those outlined by Unipart (as the data controller).

Opting out of marketing communications

All marketing communications you receive will include a mechanism that will allow you to opt out. This will be in the form of:

- a) An opt-out link included in all marketing emails;
- b) Details of how to opt out included in all postal marketing;

You can also contact us directly to opt out of marketing communications by telephone / email.

Opting out of marketing communications does not opt you out of receiving important business communications related to your current relationship with us. This may include communications concerning the services that you receive from us, services announcements or security information.

Who we share data with

Internal Unipart Rail and Unipart Group

Employees or agents within Unipart Rail and Unipart Group may access your personal information for the purposes set out in this notice.

Suppliers

We share personal information with our third party suppliers for the proper performance of the services they provide. This includes:

- a. Email service providers who assist with the effective administration of email communications;
- b. Analytics and search engine providers that assist with the improvement of our website;
- c. Third party marketing companies outside of the Unipart Group, who would manage or marketing communications for us on our behalf. This would only be under our direct instruction as per 3rd party guidance above.
- d. Professional advisers (banking, legal, insurance, consultants and auditors);
- e. Other suppliers for the performance of any contract we have entered into with you, this can include freight delivery services, e-commerce platform providers, cloud storage providers and payment service providers.
- f. Personal data may be shared with third parties as directed by the data subject in accordance with their rights under current privacy legislation.

Disclosures required by law

We may be required by law to provide personal information to law enforcement, regulators, and other official or public authorities to comply with our legal obligations.

Corporate Restructuring

We may use your personal data when managing the proposed acquisition or sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from a prospective buyer or merging organisation.

Transfers of data outside of the UK

We may share your data within the Unipart Group or with third party suppliers for the purposes set out above, which may involve transferring data outside of the UK and the European Economic Area (EEA).

Where personal information is transferred to entities outside of the EEA, we will ensure there are appropriate safeguards in place. These will include one or more of the following:

- a) Only transferring personal data to countries that the European Commission has decided provide an adequate level of protection;
- b) Using model contract clauses approved by the European Commission;
- c) Only using suppliers and providers that can offer a level of protection that has been approved by the European Commission, such as participants in the U.S.- EU Privacy Shield.
- d) International transfers done on the basis of your explicit consent.
- e) International transfers that are necessary for one of the reasons set out in applicable data protection law.

To obtain a copy of these safeguards please contact our data protection team: group.dataprotection@unipart.com

How long we keep personal data

We will only keep hold of personal information for as long as necessary to fulfil the purpose we collected it for and for such additional period as is necessary in connection with both our and your legal rights and obligations. The length of time will vary and will be influenced by:

- a) How long the data is needed for the purpose or purposes it was collected;
- b) Any legal, regulatory or accounting requirements that may apply.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (e.g tax and financial regulations, statutory reporting for employment purposes etc). We will hold your personal information on our systems for as long as is necessary for the relevant activity, for as long as is set out in any relevant contract you hold with us or for as long as is set in our retention schedule.

For further clarification on specific data please contact the Data Protection Team who will assist further.

We will take specific steps (as required by applicable data protection law) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

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 your data transmitted to our website; any transmission is at your own risk. Once we have received your information, however, we will use strict procedures and security features to try to prevent unauthorised access to your personal data.

Your legal rights

If you wish to exercise any of your rights over the personal data we hold about you, please contact our data protection team at: dpo@unipart.com

The following rights apply to the personal data we process:

Right to be informed

We will supply you with fair processing information when we collect your personal data from you (e.g. when we register you as a customer) and through privacy notices such as this one.

Right of access

You have the right to access the personal information we hold in relation to you, including details of how we process your data.

We will request proof of identification in order to protect your information and we will request specific information from you to help us identify the data you wish to access. This may include processing dates, products and services the processing may relate to, and any other relevant information that will help us respond to your request.

Right to erasure

Subject to certain conditions, you have the right to request that we delete or remove personal information we hold in relation to you, e.g. where your personal data is no longer needed for the purpose for which it was collected or where the relevant processing is unlawful.

Right to rectify your personal data

You have the right to correct your personal data. We will need to verify the accuracy of the new data you provide to us before we accept your request.

Right to object to processing

You have the right to object to certain processing e.g. direct marketing (please see the 'Marketing' section for more information).

Right to restrict processing

You have the right to restrict the processing of your personal data in the following scenarios:

- a) You want us to establish the data's accuracy;
- b) If the processing was unlawful but you do not want your personal data deleted;
- c) You need us to hold the data even if we no longer require it (where you need to establish, exercise or defend a legal claim).
- d) You have objected to our use of your data but we need to establish if we have an overriding legitimate purpose for processing your personal data.

Right to data portability

You have the right to data portability where we have relied on consent or contractual obligation as the lawful basis for processing and the processing is carried out using automated means (i.e. digital files and storage systems).

We will provide you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format.

This right only applies to personal data that has been provided to us by you.

Your right to withdraw consent

You have the right to withdraw consent at any time where we have relied on consent to process your personal data for a specific purpose. If you do decide to withdraw your consent, we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of consent won't impact any of our processing up to that point.

Automated decision making

We do not use any automated decision making except where we anonymise personal data for research or statistical reasons.

How to contact us

Customers with enquiries about products or services provided by Unipart Rail can contact us using the details provided on www.unipartrail.com

If you have any concerns over how we use or have handled your personal information, you can contact our Group Data Protection team directly:

Data Protection Team - Group IT Security
Unipart House
Cowley
Oxford
OX4 2PG
group.dataprotection@unipart.com

Our Data Protection Officer

Unipart has appointed a Data Protection Officer for Unipart Group. You can contact our DPO directly at:

Vicci Jarvis
Data Protection Officer
Unipart House
Cowley
Oxford
OX4 2PG
DPO@unipart.com

Right to complain to the supervisory body

You have the right to make a complaint to the Information Commissioner's Office at any time if you feel we have failed in our legal obligations:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

We would appreciate the chance to deal with your concerns before you contact the ICO.

Changes to this Privacy Notice

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and group and affiliated companies. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law. We have a Data Protection programme in place to oversee effective and secure processing of your personal data.