
Supplementary Privacy Notice (Vehicle Telematics and Dashcams)

March 2025

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| v1.1 | May 2023 | Policy finalised following revision and review of draft, with amendments | HSEQF Director | The Board | CG1-POL-017b |
| v1.2 | March 2025 | Review of policy with amendments | Head of Internal Investigations | The Board | POL-017b |

Supplementary Privacy Notice (Vehicle Telematics and Dashcams)

Clancy Group Holdings Limited and its associated companies The Clancy Group Limited, Clancy Plant Limited and Clancy Docwra Limited ("Clancy" or "we") are committed to protecting your personal information, as well as being transparent about the personal information collected, obtained and disclosed about you.

Notice

This Privacy Notice ("Notice") describes how we collect and process personally identifiable information (personal data) about you in regard to our use of telematic technology devices and the forward-facing and driver-facing dashboard-mounted video cameras ("dashcams") installed in the fleet of commercial vehicles and company cars operated by Clancy, and to ensure that all of our data protection obligations are met in respect of this processing. This Notice also describes your rights regarding your personal data. We will only process your personal data in accordance with this Notice unless otherwise required by applicable law.

It is important that you read this Notice together with any other privacy 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 data. This Notice supplements other notices and privacy policies and is not intended to override them.

This Notice is reviewed annually by the Data Protection and Compliance Officer ("DPCO") or nominated person and will be monitored for compliance by the DPCO, and line managers/supervisors within their own area of responsibility. Routine audits will be carried out annually and may also include random and scheduled inspections by the DPCO. If you have any questions about this Notice, including any requests to exercise your legal rights, please contact our DPCO using the details set out below.

This Notice does not form part of any contract of employment, and we may amend it at any time.

Controller: This Notice is issued on behalf of the Clancy Group so when we mention "Clancy", "we", "us" or "our" in this Notice, we are referring to the relevant company in the Clancy Group responsible for processing your data.

Who does this Notice apply to?

This Notice applies to all staff working for Clancy who drive any of our commercial vehicles and/or company cars, and those members of staff's families who have legitimate access to company cars (referred to as "you" in this Notice). It is your responsibility to bring this Notice to the attention of any members of your families or others who have access to your Clancy company car.

What personal data do we collect?

Personal data collected in the telematics and dashcam processing includes:

- personal contact details including your name (as stated on your driving licence), address, email address, landline and/or mobile numbers;
- date of birth;
- gender;
- DVLA offence data;

- log-in times and last time logged in;
- vehicle details including registration numbers, VIN Number of Clancy vehicles, insurance, MOT or vehicle test and servicing details;
- logs that record vehicle behaviour before and after a collision;
- video data that records forward-looking views onto the public street from a vehicle windscreen;
- video data that records the driver of a vehicle (NB. not including audio); and pseudonymised data describing vehicle journeys which may include a home or place of work location.

The data we collect about you

We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this Notice.

We will collect the personal data that we process from you and the telematics devices and dashcams fitted to our vehicles which you drive.

Personal data is retained in restricted-access folders on the Clancy network and by the third-party processor company which supplies the telematics and dashcam system, Matrix Telematics Limited ("Matrix").

We take your privacy very seriously and will never sell your data.

Use of personal data including our lawful bases for processing personal information

We only process your personal data where applicable law permits or requires it for vehicle telematics and onboard video monitoring, where the processing is necessary to comply with a legal obligation that applies to us, to protect your vital interests, or with your consent if applicable law requires consent.

We process your personal data for the following legitimate business purposes:

- to inform Clancy on the location and usage of its mobile assets;
- to keep you safe when in a Clancy vehicle safe and to ensure vehicles are maintained;
- through the application of proprietary algorithms, to generate profiles for driving behaviour (e.g. harsh breaking, harsh acceleration, poor steering, fuel usage information) for driver improvement and education and/or insurance risk management;
- when a collision is detected (for driver compliance);
- to inform stakeholders such as insurance companies, employers or leasing companies of the collision information;
- the personal data may be aggregated with others' personal data to detect fraud (e.g. fuel fraud), for internal investigations and/or criminal investigations, including data protection requests from law enforcement agencies and allegations or complaints of misconduct by Clancy employees or other users of Clancy vehicles;
- to install or service the telematics equipment on Clancy's vehicles; and
- to have the ability to track fleet vehicles for anti-theft and other protections.



We may process your personal data without your knowledge or consent where required by applicable law or regulation. As we rely on legitimate interests as the lawful basis for processing personal data, we have ensured that your privacy rights and freedoms are not overridden.

We may also process your personal data for our own legitimate interests, including for the following purposes:

- to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution; and
- to conduct data analytics analyses to review and better understand staff retention and attrition rates.

Collection and Use of Special Categories of Personal Data

The following special categories of personal data are considered sensitive and may receive special protection:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data;
- biometric data;
- data concerning health; and
- data concerning sex life or sexual orientation.

Data relating to criminal convictions and offences also receive special protection.

We do not envisage that the telematics and dashcams system will collect any of your special category data, beyond such visible characteristics (e.g. any religious symbols you might display) as you may choose to make public yourself. Where we have a legitimate need to process special categories of personal data for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

We will only retain special categories of personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

Who we share your personal data with externally

We will only disclose your personal data to third parties where required by law or to our employees, sub-contractors, designated agents, or third-party service providers who require such information to assist us with administering the telematics and dashcam system, including third-party service providers who provide services to us or on our behalf.

Third-party recipients of your data may include, but are not limited to,

- Matrix;
- Insurers;
- Other employers;
- Leasing companies;



- Police; and/or
- Data storage/ hosting providers.

We require all of our third-party service providers to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us as your employer. We do not permit our third-party service providers who process your personal data on our behalf to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.

Data security

We take data protection seriously, and as such, we have internal policies/procedures (such as our Data Protection Policy, Data Breach and Incident Management Policy, and Records Management Policy). We maintain a range of security controls in place to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by Clancy staff in the performance of their duties, or third-party personnel in performance of the contract we have with their employers.

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

We do not transfer or store any telematics or dashcam data outside the European Union.

Data retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes.

Subject to the previous paragraph, dashcam footage will be automatically overwritten after a period of 64 driving hours has elapsed. Non-video telematics data is retained by the processor Matrix and by Clancy for three years during the term of Clancy's contract with it, and after termination of the contract will be returned or deleted by Matrix within 12 months. Under some circumstances we may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer a staff member of the company, we will retain and securely destroy your personal data in accordance with our Records Management Policy and applicable laws and regulations.

Details of retention periods for different aspects of your personal data are available in our Records Management Policy which can be found on One Clancy, or alternatively, requested from the HR Department.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

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.

Request rectification 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.

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 information unlawfully or where we are required to erase your personal data to comply with local law. 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.

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:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful, but you do not want us to erase it;
- 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; and or
- you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

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.

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 information which override your rights and freedoms.

Request the transfer of your personal data to you or to a third party (data portability). 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.

If you wish to exercise any of the rights set out above, please contact the Head of Internal Investigations (GDPR & DPA Compliance Officer) at Roland.Thomas@theclancygroup.co.uk

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 could refuse to comply with your request in these circumstances.

If you wish to exercise your rights and it relates to personal information you provided to another organisation that contracted with Clancy for Clancy to provide services to you then you must exercise your rights directly with that organisation.

What we may need from you

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.

Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

More information can be found on the processing of your personal data in Clancy's Individual Rights Policy.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

Changes to this Notice and your duty to inform us of changes

We reserve the right to update this Notice at any time, and we will provide you with a new Notice when we make any updates. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

We keep this Notice under regular review. Historic versions can be obtained by contacting us. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Contact details

If you have any questions about this Notice or how we handle your personal data, or would like to request access to your personal data please contact:

Roland Thomas at: roland.thomas@theclancygroup.co.uk

If you are unsatisfied with our response to any issues that you raise with us, you have the right at any time to make a complaint to the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113