

## Privacy Policy

HSS respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

### 1. Important information and who we are

Any reference to "we", "us" or "HSS" means HSS The Hire Service Company (registered company number 11084154) or, where applicable, our group companies (which include our holding companies and all subsidiary companies in the HSS group). Our registered office address is at Unit 1, Haslemere Industrial Estate, Silver Jubilee Way, Middlesex, Heathrow TW4 6NF.

This Privacy Policy sets out the basis on which we collect information from you and how we use the information we collect or which you provide. This includes information which we collect or that you provide manually or via any HSS website or via other online services and platforms (together, our "Site").

If you have any questions regarding how we use your information or you wish to exercise any of your rights in relation to your information (as set out in paragraph 9 below), please contact our Data Governance Team at The Hire Service Company, Unit 1, Haslemere Industrial Estate, Silver Jubilee Way, Middlesex, Heathrow TW4 6NF.

Our Site may include links to third party 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 these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### 2. The data we collect about you

You may give us information about you when you do any of the following:

- contact us by phone or by using our 'Request a call back' facility by providing your telephone number or by sending us a text message;
- create a trade account (and become an 'HSS The Hire Service Company Account Customer'), a registered user or non-trade customer account;
- sign up to receive our various newsletters by email;
- obtain a quote for hire of our products or services, e.g. obtain a quote for skip hire by providing us with your email address and information about the type and volume and waste you would like to dispose of;
- purchase our products or services;
- book a place on an HSS Training course and/or share information about our training programs with people you think may be interested in our courses;
- apply for a job with us, including submitting an online job application (and/or your CV); and
- consent to be notified of products and/or services that may be of interest to you (based on your purchase history or browsing of our Site).

If you want to use any of these services, you may need to provide us with some additional personal information so that we can liaise with you in order to deal with your request, query, purchase, quotation request, booking, application and/or customer account registration. If you do choose to provide us with your personal information, we will collect that information for our own use and for the purposes described in this Policy.

### **What type of personal information do we collect?**

When you provide personal details to us, we may collect the following personal information from you:

- your full name and date of birth;
- your business and home contact details e.g. address, telephone numbers (including your mobile telephone number) and e-mail address;
- pre-contractual ID documentation (such as your driving licence or passport) so that we can check who you are and where you live in order to safeguard against fraud and criminal activity;
- details of the reason(s) for your contact, as set out above;
- if you create a customer account - your username, password and details of the product(s) and/or service(s) that you add to your “basket” (so that you can be notified should the checkout process not complete);
- if you make a request for a quotation or an order for hire/purchase/supply of services:
  - financial account information, such as credit/debit card number and other payment information; and
  - delivery information which may include your home or work address and telephone number;
- if you submit a job application to us:
  - your employment history, qualifications, references and other relevant employment details you choose to submit to us as part of any job application; and
  - any personal data such as your date of birth and national insurance number (and which may also include sensitive personal data) which is contained within your CV and/or other supporting documentation provided with (or instead of) your job application form;
- if you book a place on one of our training courses:
  - financial account information, such as credit/debit card number and other payment information and ID information, including, on occasion, national insurance number; and
  - to the extent that you feel it may be difficult for you to take part in the training and/or complete any assessments as a result, relevant information about your language and/or literacy ability and your health and/or fitness;
- information necessary for legal compliance;
- your social media content (where this is in the public domain), including when you “like” us or make posts on our pages on social networking websites, such as Facebook,

Twitter, YouTube and Instagram, and any messages you send us via social media. This information can include posts, comments, pictures and video footage;

- CCTV footage taken at any of our sites for security purposes;
- voice recordings for training and monitoring;
- IP (Internet Protocol) address: your IP address indicates your location, unless you are using a VPN service;
- MAC (Media Access Control) address: is a unique identifier, or address, assigned by the manufacturer of your device;
- Device: what type of device you are using (TV, smartphone, laptop, desktop);
- OS (Operation system): what operating system your device has (IOS, Android, Windows, Linux, MAC OS X);
- Browser & browser version: which web browser you are using (Internet Explorer/Edge, Opera, Chrome, Safari, Firefox);
- Domain: depending on your device and browser settings, we sometimes identify the web address of the domain you came from before landing on our website;
- Clickstream data: this is a list of all the web pages that you visited, and the order you viewed them in, on each visit to [www.thehireservicecompany.com](http://www.thehireservicecompany.com) or our Sites. We also record how much time you spend on each web page, and record any actions you make on each page; and/or
- Cookies: these are small text files that our website places on your device, so that our website can remember something about you at a later time.

This information will be collected primarily from you as information voluntarily provided to us, but we may also collect it where lawful to do so from (and combine it with information from) public sources, third party service providers, individuals who you have indicated have agreed for you to provide their personal information, government, tax or law enforcement agencies and other third parties. We may also collect personal information about you from your use of other Company or Group websites or services.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your data by filling in forms or by corresponding with us by post, phone, email or in person or by uploading information to our app or websites, or via third party software providers we use. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;

- enter a competition, promotion or survey; or
- give us some feedback.
- **Automated technologies or interactions.** As you interact with our Site, 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.
- Obtaining **technical data** from the following parties:
  - analytics providers in the EU;
  - advertising networks in the EU; and
  - search information providers in the EU.
- Obtaining **Identity and Contact Data from publicly available sources** such as Companies House, the Electoral Register, database bureaux and Credit Reference Agencies based inside the EU. Details on why we use Credit Reference Agencies and what data is shared is set out in section 5 below.

#### 4. How we use your personal data

We use the information we collect for the following purposes:

- to respond and/or deal with your request or enquiry and obtain any feedback from you;
- to process and administer your booking request(s), hire request(s) or order(s) of our products and/or services;
- to perform ID and credit checks to verify your identity and ensure your location, ability to pay and creditworthiness and to safeguard against fraud and criminal activity;
- to offer and improve our products and services and to ensure that content from the Site is presented in the most effective manner for you and for your computer (or other electronic internet-enabled device);
- to administer the Site;
- to contact you (directly, or through a relevant partner or agent) by e-mail or phone for any of the above reasons;
- subject to your consent where required under applicable laws, to carry out direct marketing and/or e-mail marketing;
- to evaluate any job application(s) you choose to submit to us and for the administration of the recruitment process following receipt of your application (where your application is successful);
- where you inform us that you feel it may be difficult for you to take part in the training and/or complete any assessments as a result of your language and/or literacy ability and your health and/or fitness, to make any reasonable adjustments which may be necessary to assist your completion of such courses;

- where necessary as part of any restructuring or sale of our business or assets;
- to perform any contract we have with you;
- to respond to any social media posts or other public comments you make which relate to us;
- for compliance with legal, regulatory and other good governance obligations; and
- to improve and measure the effectiveness of our marketing communications, including online advertising. We also share cookie and other data with entities such as Google and Facebook in order to make our advertising more relevant to you. We require any such third parties to treat your personal information as fully confidential and to fully comply with all applicable data protection legislation.

## 5. Disclosure of your personal data

We only share your information where we can do so in accordance with our legal data protection and privacy obligations. We share the information we collect with:

- **Our group companies and business divisions** for the performance of contracts and to offer you a wider range of related services.
- **Suppliers and sub-contractors** for the performance of contracts.
- **People and businesses** who help us provide our Site and related services to you, for example, information technology companies who host and/or maintain our Site and payment services companies who enable you to use payment cards with us. We use Stripe for payment, analytics, and other business services. Stripe collects identifying information about the devices that connect to its services. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection. You can learn more about Stripe and read its privacy policy at [www.stripe.com/privacy](https://www.stripe.com/privacy).
- **Our insurers and insurance brokers** where required in order for us to be able to obtain insurance against risks we face in running our business. They may retain this information for the purpose of ongoing risk assessment and insurance broking and underwriting services.
- **Our auditors, professional advisers, compliance managers, government, law enforcement or regulatory authorities** in order to fulfil our legal, statutory and regulatory obligations or as required for tax purposes.
- **Our registrars** in order to administer our share register, employee share plans, dividend payments, voting, elections, annual report correspondence and identifying relevant products and services.
- **External third parties** in response to a legal process, including as part of a restructuring, financing or sale of HSS or any of its businesses or assets.
- **Credit reference agencies.** We will supply your personal information to credit reference agencies (CRAs) who will check the details supplied against any database, public or otherwise, and they will give us information about you, such as about your financial history. We do this to assess creditworthiness, check your identity, manage your account, trace, recover debts, and prevent fraud and criminal activity. A record of the

search may be retained by CRAs. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at [www.experian.co.uk/legal/crain/](http://www.experian.co.uk/legal/crain/) and <https://www.creditsafe.com/gb/en/legal/privacy-policy.html>. As part of the credit check process for cash customers who want to place an order with us, you may be asked to provide your name, address history, an image of yourself and an identity document such as a driving licence or passport. This information will be provided to CRAs, who will share it with their partners and other organisations, in order to carry out the credit check process, including via Document Verification Services.

## **6. International transfers**

We do not transfer your personal data outside the European Economic Area.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, taxation or reporting requirements.

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.

You can request details of retention periods for specific aspects of your personal data by contacting us at The Hire Service Company (HSS), Unit 1, Haslemere Industrial Estate, Silver Jubilee Way, Middlesex, Heathrow TW4 6NF.

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.

## 9. Your rights and managing your information

Your rights are summarised below and we will adhere to these. However, we reserve the right not to comply with any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious or vexatious, technically very onerous, will involve disproportionate effort or could be to the detriment of the rights of others, or if we cannot satisfy ourselves as to your identity. In order to protect the person who is the subject of the access request, we will ask you to prove your identity before providing any information.

**a) Asking us about your information** You have the right to ask us whether we hold information about you and, if so, for us to give you certain details about that information and/or the information itself. This right is commonly known as a 'subject access request'. If you would like to make a subject access request, you can do so [here](#).

**b) Correcting inaccurate information** If you consider that any of the information we collect on you may be inaccurate or incomplete, and you cannot correct such inaccuracy or omission yourself through your account with us, please contact us with your queries and/or with the updated information.

**c) Erasing information** You have the right to ask us to erase your information in the following circumstances:

- the information is no longer necessary for the purposes for which we collected it;
- we need your consent to use the information and you withdraw such consent;
- you object to us using your information (a) for the performance of a task carried out in the public interest; or (b) for the purposes of our legitimate interests (e.g. direct marketing) and there are no overriding legitimate grounds for the processing;
- you unsubscribe from our marketing communications;
- we have used your information unlawfully; or
- deletion of the information is required to comply with a legal obligation applicable to us.

**d) Restricting processing** You have the right to require us to restrict our use of your information where one of the following applies:

- while we verify the accuracy of the information that we hold about you where you contest the accuracy of the same;
- we have used your information unlawfully, but you request us to restrict its use instead of deleting it;
- we no longer need the information for the purpose for which we collected it, but you need it to deal with a legal claim; or
- while we verify that our legitimate grounds override your right to object where you have objected to us using your information.

**e) Right to object** If we are using your information on the basis of public interest or our legitimate interests, you may object to this at any time by contacting us as set out below.

**f) Right to data portability** You have the right to request that we transfer the data you have provided to us to another organisation, or directly to you, under certain conditions.

**g) Withdrawal of consent** If you have consented to us using your information (e.g. for marketing purposes), you have the right to alter your preferences or withdraw this consent by contacting us as set out below or by clicking the unsubscribe link in any email communication. This will not affect the lawfulness of any use of your information that we make before you amend your preferences or withdraw your consent.

## **10. How to contact us**

You can contact us with any queries about how we use your information by contacting our Data Governance Team at The Hire Service Company (HSS), Unit 1, Haslemere Industrial Estate, Silver Jubilee Way, Middlesex, Heathrow TW4 6NF.