

Privacy Notice

(last updated April 2018)

Vp plc and our group companies ("we", "us" and "our") are committed to protecting and respecting your privacy, as required under the General Data Protection Regulation (GDPR).

Our Privacy Notice applies to all applications and services offered by Vp plc (a company incorporated in England with company registration number 481833 and whose registered office address is Central House, Otley Road, Harrogate, HG3 1UD), and its subsidiary companies. The Vp group includes UK Forks, Groundforce, TPA Portable Roadways and Airpac Bukom Oilfield Services, which are operating divisions of Vp plc, together with our wholly owned subsidiaries Brandon Hire Ltd, Hire Station Ltd and Torrent Trackside Ltd.

Please read our Privacy Notice carefully as it describes our collection, use, disclosure, retention and protection of your personal data. This notice applies to any website, application or service which references this Privacy Notice. Where you provide us with your personal data in any of the ways described in section 1 below, you agree that we may collect, store and use it:

- (a) in order to perform our contractual obligations to you;
- (b) based on our legitimate interests for processing (such as for internal administrative purpose or to provide information around products and services that we provide); or
- (c) based on your consent, which you may withdraw at any time, as described in this Privacy Notice.

1. How we collect personal data

To the extent permissible under applicable law, we collect personal data about you and any other party whose details you provide to us when you:

- fill in forms on our site (such as our 'Contact Us', 'Request a Call Back' or 'Request a Catalogue' forms). This will include personal data such as your name, contact details and any further personal data you provide in relation to your query;
- open an account or while logged in to your existing account. This may include personal data such as your name, contact details or other identification details and financial personal data;
- complete any surveys or enter any competitions;
- interact with us using social media;
- provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details; and
- contact us offline, for example by telephone, SMS, email or post.

We will also collect your personal data where you only partially complete and/or abandon any personal data inputted into our website and/or other online forms and may use this personal data to contact you to remind you to complete any outstanding personal data and/or for marketing purposes.

We also collect personal data from your devices (including mobile devices) and applications you use to access and use any of our websites, applications or services (for example, we may collect the device identification number and type, location personal data and connection personal data such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log personal data) and we will ask for your permission before we do so. We may do this using cookies or similar technologies (as described in section 10 below). By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

We may enhance personal data we collect from you with personal data that we receive from other sources in the course of providing services to you (including, for example, personal data received from other companies within our group, business partners, any sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search personal data providers and credit reference agencies).

If you give us personal data about someone else, you are responsible for ensuring that you comply with any consent obligations under applicable data protection laws. In so far as required by applicable data protection laws, you must ensure you have their explicit consent to do so before providing that information and that you explain to them how we collect, use, disclose and retain their personal data or direct them to read our Privacy Notice.

2. How we use your personal data

We may use your personal data for any or all of the following reasons:

- to respond to any specific queries, carry out our obligations arising from any contracts entered into between you and us and to provide you with information, products and services that you request from us;
- manage and administer your use of applications, products and services you have asked us to provide;
- manage our relationship with you (for example, customer services and support activities);
- monitor, measure, improve and protect our content, website, applications and services and provide an enhanced personal user experience for you;
- provide you with any personal data that we are required to send you to comply with our regulatory or legal obligations;
- contact you to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products and services);
- to monitor, carry out statistical analysis and benchmarking, provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual;

- deliver targeted advertising, marketing or information to you which we reasonably believe may be useful to you, based on your use of our applications and services;
- provide you with location based services (for example, advertising and other personalised content), where we collect geo-location data;
- to identify accounts and provide information to appropriate authorities (e.g. HMRC) as part of an ongoing enquiry.

We retain personal data that has been provided after the closure of any account, following a decision by us not to offer an account or if you decide not to proceed. This personal data will be held and used for as long as necessary for legitimate business purposes and no longer than the timeframe permitted by regulation and current law.

Our website, applications (including mobile applications) and services may contain technology that enables us to:

- check specific personal data from your device or systems directly relevant to your use of the websites, applications or services against our records to make sure the websites, applications or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
- obtain personal data relating to any technical errors or other issues with our website, applications and services;
- collect personal data about how you and users use the functions of the features of our website, applications and services; and
- gather statistical personal data about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services (where applicable).

In addition to the purposes described in this section, we may also use personal data that we gather to deliver targeted advertising, marketing or personalised services to you which we believe may be useful, based on your use of the website, applications

or services or any other personal data we have about you. Sections 3 and 4 of this Policy Notice provide further details on how we will do this.

Depending on the websites, applications or services, you may be able to configure these features to suit your preferences.

We may monitor and record our communications with you, including e-mails and phone conversations. Personal data which we collect may then be used for training purposes, quality assurance, to record details about our website, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

Mobile data

We may obtain personal data through mobile applications that you or your users install on their mobile devices to access and use our website, applications or services or which you or your users use to provide other services related to that mobile application (for example, to sync personal data from our application or service with such mobile application).

Mobile applications may provide us with personal data related to a user's use of that mobile application and use of our applications and services accessed using that mobile application. We may use such personal data to provide and improve the mobile application or our own application or services. For example, activity undertaken within a mobile application may be logged.

You can configure our mobile application's privacy settings on your device but this may affect the performance of that mobile application and the way it interacts with our applications and services.

3. Sharing your personal data

As the data controller for information that you have provided to us, we take our responsibility to protect that data seriously. We will only share your data with third parties where we believe there is a clear legitimate interest in doing so, that will be of likely benefit to you. As part of this, we may share your personal data with:

- any company within the Vp group including those companies listed at the top of this Privacy Notice, for the purposes set out in this Privacy Notice;
- our service providers and agents (including their sub-contractors) or third parties which process personal data on our behalf (e.g. internet service and platform providers, payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the services and personal data you have requested or which we believe is of interest to you;
- rehire providers;
- third parties used to facilitate payment transactions, for example banks;
- credit reference agencies;
- any other relevant third parties in order to meet our legal and regulatory obligations.

We may share non-personally identifiable personal data about the use of our website, applications, products or services publicly or with third parties but this will not include personal data that can be used to identify you.

4. Marketing

From time to time, we may use your personal data to contact you with details about our applications, products and services which we feel may be of interest to you. We may also share your personal data with our group companies and we may contact you with information about their products or services which we feel may be of interest to you. We or they may wish to contact you for this purpose by telephone, post, SMS or email. You have the right at any time to stop us from contacting you for marketing purposes. You may also request at any time that we do not share your personal data with third parties referred to in this paragraph. If you wish to exercise these rights you can do so by selecting your contact preferences at the point where you provide us with your personal data on our websites, applications or services, using any preference centres we give you access to or by sending us an email to gdpr@vpplc.com. You can also unsubscribe from any email marketing using the links provided in the emails we send to you.

5. Your personal data and your rights

If you are based within the EEA or within another jurisdiction having similar data protection laws, in certain circumstances you have the following rights:

- the right to be told how we use your personal data and obtain access to your personal data;
- the right to have your personal data rectified or erased or place restrictions on processing your personal data;
- the right to object to the processing of your personal data in most instances, e.g. for direct marketing purposes;
- the right to have any personal data you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”) and where you request this;
- where the processing of your personal data is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions;
- the right to object to any decisions based on the automated processing of your personal data, including profiling; and
- the right to lodge a complaint with the supervisory authority responsible for data protection matters (e.g. in the UK, the Information Commissioner’s Office).

If we hold any personal data about you which is incorrect or if there are any changes to your details, please let us know so that we can keep our records accurate and up to date. We may periodically ask that you review your data to ensure that the information we hold is correct. We will not do this if you have asked us not to communicate with you.

If you withdraw your consent to the use of your personal data for purposes set out in our Privacy Notice, we may not be able to provide you with access to all or parts of our websites, applications, and services.

We will retain your personal data for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business

purposes, in accordance with the Vp Group Data Retention and Destruction Policy or as otherwise permitted applicable laws and regulation. Where we no longer need your personal data, we will dispose of it in a secure manner (without further notice to you).

6. Changes to our privacy notice

We may change our Privacy Notice from time to time. However we will not reduce your rights under this Privacy Notice. We will always update this Privacy Notice on our website, so please try to read it when you visit the website (the 'last updated' reference tells you when we last updated our Privacy Notice). Previous versions of our privacy notice are available on request from The Company Secretary, gdpr@vpplc.com.

Should we make changes to our privacy notice, we may inform you of these.

7. Security and storage of personal data

We will keep your personal data secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. We will do our best to protect your personal data but we cannot guarantee the security of your personal data which is transmitted to our website, applications or services or to other website, applications and services via any medium that you provide information to use. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe – we will never intentionally share this password with anyone.

Personal data that we process for any of the purposes outlined above shall not be kept for longer than we believe is necessary for those purposes.

If you believe your account has been compromised, please contact us at gdpr@vpplc.com.

8. Transfers outside of the European Economic Area

Personal data in the European Union is protected by data protection laws but other countries do not necessarily protect your personal data in the same way.

Our website may be hosted outside of the EEA (which means all the EU countries plus Norway, Iceland and Liechtenstein) (“EEA”) and this means that we may transfer personal data which is submitted by you through the website or the application or service outside the EEA. When you send an email to us, this will also be stored on our email servers which are hosted in the United Kingdom.

We may use service providers based outside of the EEA to help us provide our website, applications and services to you (for example, platform and payment providers who help us deliver our applications and services, provide advertising services or execute your payments) and this means that we may transfer your personal data to service providers outside the EEA for the purpose of providing our applications, advertising and services to you.

We take steps to ensure that where your personal data is transferred outside of the EEA by our service providers and hosting providers, appropriate measures and controls are in place to protect that personal data in accordance with applicable data protection laws and regulations. For example, we may share personal data with our group companies based outside the EEA for the purposes envisaged by this Privacy Notice. All Vp group companies are subject to Vp group data protection policies designed to protect data in accordance with EU data protection laws. In all cases, data transfers are made in accordance with the requirements of Regulations (EU) 2016/679 (the General Data Protection Regulations or “GDPR”) and may be based on the use of the European Commission’s Standard Model Clauses for transfers of personal data outside the EEA.

By using our website, products or services or by interacting with us in the ways described in this Privacy Notice, you consent to the transfer of your personal data outside the EEA in the circumstances set out in this Privacy Notice. If you do not want your personal data to be transferred outside the EEA you should not use our website, applications or services.

9. Other sites and social media

If you follow a link from our website, application or service to another site or service, not within the Vp group, this notice will no longer apply. We are not responsible for the personal data handling practices of third party sites or services and we encourage you to read the privacy notices appearing on those sites or services.

Our websites, applications or services may enable you to share personal data with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal data retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal data you enable us to access from that account.

10. Cookies, Analytics and Traffic Data

Cookies are small text files which are transferred from our websites, applications or services and stored on your device. We use cookies to help us provide you with a personalised service, and to help make our websites, applications and services better for you.

Our cookies may be **session cookies** (temporary cookies that identify and track users within our websites, applications or services which are deleted when you close your browser or leave your session in the application or service) or **persistent cookies** (cookies which enable our websites, applications or services to “remember” who you are and to remember your preferences within our websites, applications or services and which will stay on your computer or device after you close your browser or leave your session in the application or service).

We use the following different types of cookies:

Strictly necessary cookies

These are cookies which are needed for our websites, applications or services to function properly, for example, these cookies allow you to access secure areas of our website or to remember what you have put into your shopping basket.

Performance cookies and analytics technologies

These cookies collect personal data about how visitors and users use our websites, applications and services, for instance which functionality visitors use most often, and if they get error messages from areas of the websites, applications or services. These cookies don't collect personal data that identifies a visitor or user. All personal data these cookies collect is aggregated and therefore anonymous. We only use these cookies to improve how our website, applications and services work.

Functionality cookies

These cookies allow our websites, applications and services to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for. The personal data these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

Targeting or advertising cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operators' permission. They remember that you have visited a website and this personal data is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Web beacons and parameter tracking

We also use cookies and similar software known as web beacons to count users who have visited our website after clicking through from one of our advertisements on another website or in emails and to collect details of any products or services purchased. These web beacons collect limited personal data which does not identify particular individuals. It is not possible to refuse the use of web beacons. However, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

IP Address and traffic data

We keep a record of traffic data which is logged automatically by our servers, such as your Internet Protocol (IP) address, device personal data, the website that you visited before ours and the website you visit after leaving our site. We also collect some site, application and service statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

Find out more about the individual cookies and analytics technologies that we use.

Description	Purpose
Google Analytics	Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the websites, applications or services. The personal data generated by the cookie about your use of the websites, applications or services (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this personal data for the purpose of evaluating your use of the websites, applications or services compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this personal data to third parties where required to do so by law, or where such third parties process the personal data on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser or within the application, however please note that if you do this you may not be able to use the full functionality of our website. By using our websites, applications or services you consent to the processing of data about you by Google in the manner and for the purposes set out above. To find out more, see: <i>"How Google uses data when you use our partners' sites or apps"</i> (located at www.google.com/policies/privacy/partners/ , or any other URL Google may provide from time to time).

How to disable cookies

You may be able to configure your browser or our website, application or service to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our website, applications or services.

11. Further information

If you have any queries about the information that we hold about you, how we treat your information, the contents of this notice, your rights, how to update your records or how to obtain a copy of the personal data that we hold about you, please write to our Company Secretary at Vp plc, Central House, Beckwith Knowle, Otley Road, Harrogate HG3 1UD or send an email to gdpr@vpplc.com.