

# NET-HERO Privacy Policy

Last updated: 1 Sept 2021

Who we are and what this policy is for

We are NET-HERO Ltd T/as NET-HERO, a company registered in England and Wales under company number 13443905 whose registered office is at 35 Dover Street, London. W1S 4NG (NET-HERO, we, us, our).

Our customers are private individuals and organisations that want to make their vehicle Net Zero and become an environmentally responsible driver.

When you browse our website, we are the controller for that information (which means we decide what personal data we collect from you and how it is used).

We never intentionally collect personal data when we provide our service to our customers, and our contracts require our customers to anonymise information they send to us before we analyse it. We do however record some basic details about our customer so that we have a point of contact and we also act as the controller for this information.

This policy explains how we collect, use and store your information when you browse our website or we identify you as key personnel.

We may sometimes need to update this policy, to reflect any changes to the way NET-HERO operates or to comply with new legal requirements. We will notify you of any important changes before they take effect.

## 1. Definitions and Interpretation

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Personal data is any information that can (or could be used to) identify a living person. We have grouped together the types of personal that we collect and who we receive it from below:

Type of Personal Data	Received from
Contact information such as your name, email address and telephone number.	<ul style="list-style-type: none"><li>• you</li><li>• our customer</li></ul>
Feedback and Enquiry information such as responses you give when you rate our services or reply to a survey, any information you send when you contact us, submit an enquiry on our website or comment on our social media pages (for example, your social media handle).	<ul style="list-style-type: none"><li>• you</li><li>• our customer</li></ul>
Marketing information such as your preferred methods of communication and product types in which you are interested.	<ul style="list-style-type: none"><li>• you</li></ul>

We sometimes anonymise the personal data we collect (so it can no longer identify you as an individual) and then combine it with other anonymous information so it becomes aggregated data. Aggregated data helps us identify trends (such as the percentage of website visitors visiting a particular webpage on our website). Data protection law does not govern the use of aggregated data and the various rights described below do not apply to it.

Any information we collect via our website is immediately aggregated and we do not analyse individual visitor interaction. We do not operate any cookies on our website. All information we receive about our website traffic is provided by [Plausible.io](https://plausible.io).

## 2. How we use your information

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NET-HERO is required to identify a legal justification (also known as a lawful basis) for collecting and using your personal data. There are six legal justifications which organisations can rely on under UK and European Law. The most relevant of these to NET-HERO are where we use your personal data to:

- pursue our legitimate interests (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy); and
- comply with a legal obligation that we have.

The table below sets out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed in the table, we will update our privacy notice and notify you.

Purposes	Justification
Taking steps to enter into a contract with our customer	Legitimate interests (necessary to conclude our contract with our customer and obtain contact details for key personnel)
Providing our service to our customer	Legitimate interests (necessary to fulfil our service contract with our customer)
Processing payments and collecting and recovering monies owed to us	Legitimate interests (to receive payments or recover monies owed to us)
Sending marketing communications	Legitimate interests (necessary to promote our services and grow our business)
Asking you to participate in surveys and other types of feedback	Legitimate interests (necessary for product and service improvement purposes)
Understanding how our service and website are being used	Legitimate interests (necessary to improve and optimise our services and website)
Administering and protecting our services, website and internal systems	Legitimate interests (necessary to provide our services and website, monitor and improve network security and prevent fraud)
Notifying you about changes to our privacy policy	Legal obligation (necessary to comply with our obligations under data protection law)

## 3. Marketing

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NET-HERO provides its services to businesses and consumers. We only ever send marketing communications to contact details supplied, and we always include a link in our emails so that you can unsubscribe at any time.

NET-HERO uses HubSpot to help us deliver and monitor the communications we send. Their digital tools let us see whether a recipient has clicked any of the links in our email, which help us understand what content that recipient appears to be interested in and allow us to personalise the content of future of our messages.

Pixels (which are a similar technology to cookies) within those emails enable us to see:

- if the email was opened
- where the device opening the email was located (based on the device's IP address)

- the type of email service (e.g. Outlook) that was used
- if the email (or its content) were shared on social media
- if the email was flagged as spam

#### 4. Who we share your information with

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We share (or may share) your personal data with:

- Our personnel: NET-HERO employees (or other types of workers) who have contracts containing confidentiality and data protection obligations.
- Our customers (existing and prospective): where we correspond or administer our services. Our customer acts as an independent controller for the information they receive from us (which means they make their own decisions about how they use that information). If you have any questions about how they use the information they receive, you should ask to see their privacy information.
- Our supply chain: other organisations we engage to help us provide our services and website. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations.
- Regulatory authorities: such as HM Revenue & Customs, the UK tax authority
- Our professional advisers: such as our accountants or legal advisors where we require specialist advice to help us conduct our business
- Any actual or potential buyer of our business

#### 5. Where your information is located or transferred to

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We will only transfer information outside of the UK where we have a valid legal mechanism in place (to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located, for example, by using contracts approved by the European Commission or UK Secretary of State).

If you use access our website whilst abroad or our customer is based outside the UK then your personal data may be stored on servers located in the same country that our customer or you are.

#### 6. How we keep your information safe

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We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication
- policies and training
- taking regular back-ups of our IT systems

If you receive any unusual emails from us, please let us know by emailing us at [privacy@NET-HERO.org](mailto:privacy@NET-HERO.org)

#### 7. How long we keep your information

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We keep information about our customers' key personnel for up to six years after the end of our agreement ends, unless our customer informs us before that that you no longer work for them.

We keep information about prospective customers' key personnel indefinitely, or until we receive replacement details or a request to remove that individual's details.

#### 8. Your legal rights

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Under UK and European law, you have specific rights in relation to your personal data.

It is usually free for you exercise your rights and we aim to respond within one month (although we may ask you if we can extend this deadline up to a maximum of two months if your request is particularly complex or we receive multiple requests at once).

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. If this happens we will always inform you in writing.

We may charge a fee where we decide to proceed with a request that we believe is unfounded or excessive.

If you wish to make any of the legal right requests listed below, please email [privacy@NET\\_HERO.com](mailto:privacy@NET_HERO.com)

- The right of access (obtaining a copy of your data)
- The right to rectification (correcting your data)
- The right to erasure (deleting your data)
- The right to restrict processing (to stop use of your data for a time limited period)
- The right to data portability (to move your data to another organisation)
- The right to object (to object to our use of your data)
- The right to complain to the relevant supervisory authority (in the UK, this is the Information Commissioner's Office and you can contact them [here](#)). However, we hope that that if you are concerned about how we use your information that you contact us in the first instance so that we can try to help.

There are some limited exemptions to these rights, so they may not apply in every scenario and NET-HERO may decline your request (but we would explain our decision in writing if this was the case).