

Fleetcor Europe Privacy Policy

This policy was last updated on 26 October 2020.

At Fleetcor Technologies, Inc., through our affiliates operating the Allstar, epyx, Fleetcor, The Fuelcard Company, Keyfuels, r2c, Travelcard, Tankpas.nl, Transit card and CCS brands, and servicing the Shell fuel card (collectively, "Fleetcor", "we", "our" or "us"), we respect your privacy. We have implemented this privacy policy to outline how Fleetcor uses personal data relating to its customers, prospective customers, fuel card holders, web users and other individuals who interact with us.

If you are applying for a role at one of our companies, then please see our dedicated [job applicant privacy policy](#) instead.

Fleetcor considers your privacy to be important. We are committed to protecting the privacy of the information you provide to us, including your personal data. This policy describes the types of personal data we collect, how we use that data, with whom we share it, the choices you can make about our use of such data, your privacy rights and how the law protects you. We also describe the measures we take to protect the security of your personal data and how you can contact us about our privacy practices.

Who we are

To understand who your data controller is please see the section entitled "How to reach us".

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to our privacy policy and how we handle your personal data. Details about how to contact our DPO can be found in the "How to reach us" section of this privacy policy.

Information we collect

As a provider of fuel card and expense management, and vehicle network services to businesses, we may have a direct relationship with you, and you may choose to provide personal data to us in connection with that relationship or we may collect it via other means. The data we collect about you may include:

- Contact information
- Login details
- Financial information
- Content you provide to us
- Technical information about your device and website usage
- Transaction history
- Information about your characteristics and preferences

- Vehicle registration numbers and location
- Information including your ID – date of issue, expiry, number, issuing body and address (for identification purposes).

To find out more please [click here](#).

How we collect your information

We use different methods to collect data from and about you, depending upon the nature of our relationship. This may include through direct interactions we have with you, through the use of automated technologies (e.g. cookies) and from third parties or publicly available sources.

To find out more please [click here](#).

How we use your data

Depending on the nature of our relationship with you, we may use your data to:

- Process an application for an account you apply for.
- Provide the services our customers have signed up for.
- Process your transactions.
- Administer your online account.
- Protect ourselves against fraud and money laundering, verify your identity and to detect, investigate and prevent crime.
- Provide you with information about our products and services.
- Allow you to participate in interactive features e.g. via the website such as via our live chat function.
- Operate, evaluate and improve our business.
- Perform analysis (including anonymisation) of your data.
- Comply with our legal obligations, applicable industry standards and our policies.
- Administer the contracts we have with our customers, including to update contracts and to correspond with our customers about our services and the contracts.
- Other ways which we notify you of at the time of its collection or use.

To find out more please [click here](#).

Data we share and receive

We do not sell or otherwise disclose your data, except as described in this privacy policy. We may share your data with the following parties:

- Other members of the [Fleetcor group](#).
- If you are a fuel card holder, we will share transaction history and data usage information with your employer/the company you represent.
- If you are a 1link user, other subscribers of the 1link services.
- Providers of transaction services, such as card issuers, merchants, payment processors and other suppliers to assist with the transactions and administration of the fuel card services.
- Marketing and data analytics companies.
- Our commercial partners who sell similar products and services.
- Partners who provide features on our websites.
- IT suppliers.
- Risk and fraud prevention agencies and monitoring providers.
- Credit reference agencies.
- Our insurers and professional advisers.
- Regulators and other government agencies including, but not limited to, public authorities, regulators, the police and other law enforcement agencies.
- Any company to whom we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, along with its professional advisers.

We do not authorise any third parties that we share data with to use or disclose your data except as necessary to perform certain services on our behalf, to comply with legal requirements or as detailed under the Credit Reference Agencies section of this policy. We require these third parties, through our contractual arrangements with them, to appropriately safeguard the privacy and security of the data they process on our behalf.

We may also receive data about you from the following third parties:

- Social media platforms.
- Your employer.
- Credit reference agencies: information relating to credit score/suitability for products.
- Data brokers.
- Our commercial partners.
- Public databases.
- Regulators and other government agencies.

If you would like to receive a full list of our suppliers and other third parties who we share your data with or receive your data from then you can get in touch with us using the details provided in the section "How to reach us?".

Credit Reference Agencies

In order to process applications we will supply personal information you provide to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. 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.

CRAIN (Credit Reference Agency Information Notice) is a document produced by the three Credit Reference Agencies- Experian, Equifax and TransUnion (formerly Callcredit)- that explains the use of personal data they receive from third parties about individuals and/or their businesses in relation to credit activity. CRAIN has been produced in conjunction with the Information Commissioner's Office (ICO).

The CRAIN, the identities of the CRAs and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>.

Where your data may be sent

As with any multinational organisation, we are often required to transfer data internationally. Accordingly, your personal data may be transferred globally (if your data is collected within the European Union, this means that your data may be transferred outside of it).

This includes transfers that have been identified in the previous section "Who do we share your data with and for what purposes".

To find out more please [click here](#).

How we keep your information secure

Fleetcor will take appropriate technical and organisational security measures to secure your personal data and to protect it from loss, misuse or alteration. Personal data that we hold about you is stored on our secure servers or those of our appointed suppliers. Our web pages that collect your data are secured with Secured Socket Layers (SSLs).

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share this password with anyone.

Fleetcor maintains an information security program that is designed to:

- Secure and maintain confidentiality of your personal data.
- Protect against anticipated threats or hazards to security or integrity of your data.
- Protect against unauthorised access to or use of your data that could result in substantial harm or inconvenience to you or your entity if compromised.
- Comply with applicable laws.

How long we may keep your data

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, 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.

Details of retention periods for different aspects of your personal data can be requested by contacting the DPO.

In some circumstances you can ask us to delete your data, please see “Your Rights and Choices”.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with or be used to identify you) for research or statistical purposes in which case we may use such data indefinitely without further notice to you.

Children’s privacy

Fleetcor’s websites are not intended for use by children, especially those under the age of 18. No one under the age of 18 should provide any personal data or participate in any forums, chats, or online discussions. Minors under the age of 18 are prohibited from applying for emails, newsletters and/or products or services, on our websites. If we identify that we have received any such personal data we will delete it.

Your rights and choices

You may have some or all of the following rights in respect of personal data about you that we hold:

- Request us to give you access to it.
- Request us to rectify it, update it, or erase it.
- Request us to restrict our using it, in certain circumstances.
- Object to our using it, in certain circumstances.
- Where legally possible, withdraw your consent to our using it.
- Data portability, in certain circumstances.
- Opt out from or objecting to our using it for direct marketing.
- Lodge a complaint with the supervisory authority in your country (if there is one).

You are able to exercise these rights by contacting us using the details set out at in the “How to reach us” section below.

Please visit our [cookie policy](#) to learn about how you can also exercise your rights in relation to our use of cookies, web beacons and similar technologies.

To find out more please [click here](#).

How to reach us

If you have any questions about our privacy policy, including any requests to exercise your legal rights in relation to the data we hold on you, then please contact the relevant DPO using the details set out below:

Country	Product	Data Controller	DPO	Email Address	Postal Address
Austria	Shell card	FleetCor Tankkarten GmbH	Darren Pascoe	dsb@fleetcor.at	Teinfaltstraße 8/4, 1010 Wien.
Belgium	Shell card	FleetCor Belgium Srl	Darren Pascoe	dpo@fleetcorcords.be	Avenue Du Port 86c/204, 1000 Bruxelles.
	Shell card	FleetCor Belgium bv	Darren Pascoe	dpo@fleetcorcords.be	Havenlaan 86c Bus 204, 1000 Brussel.
	TravelCard	Travelcard B.V.	Darren Pascoe	dpo@fleetcorcords.be	Rue de Colonies 11, 1000 Brussel.
Czech Republic	Shell card	FleetCor Czech Republic s.r.o.	Darren Pascoe	dpo@fleetcor.cz	Voctářova 2500/20a, 180 00 Praha 8.
	CCS Bonus Fleet, CCS Bonus Plus, CCS Bonus, CCS Carnet, CCS Limit Exclusive, CCS Limit Plus, CCS Limit, CCS Toll, UTA/CCS card.	CCS Česká společnost pro platební karty s.r.o	Darren Pascoe	dpo@fleetcor.cz	Voctářova 2500/20a, 180 00 Praha 8.
Denmark	1link Services	epyx Limited	Darren Pascoe	dpo@fleetcor.com	Heath Farm Hampton Lane, Meriden, Coventry CV7 7LL, United Kingdom.
France	1link Services	Epyx France SAS	Darren Pascoe	dpo@fleetcor.com	35 Allée des Impressionistes, Le

					Cézanne,93420 Villepinte.
	Shell Card	Epyx France SAS	Darren Pascoe	dpo@fleetcor.fr	35 Allée des Impressionistes, Le Cézanne,93420 Villepinte.
Germany	Shell Card	FleetCor Deutschland GmbH	Darren Pascoe	dsb@fleetcor.de	Frankenstraße 150 c, 90461 Nürnberg.
Hungary	Shell Card	FleetCor Hungary Kft	Darren Pascoe	adatvedelem@fleetcor.hu	1062 Budapešť, Andrásy út 100.
Ireland	1link Services	epyx Limited	Darren Pascoe	dpo@fleetcor.com	Heath Farm Hampton Lane, Meriden, Coventry CV7 7LL, United Kingdom.
Lithuania	Transit Card	UAB Transit Card International	Darren Pascoe	dpo@fleetcor.lt	Mindaugo g. 44-82, LT-01311, Vilnius.
Luxembourg	Shell Card	Venturo Technologies s.a.r.l.	Darren Pascoe	dpo@fleetcor.lu	46A, avenue J.F. Kennedy, L-1855, Luxembourg.
Netherlands	Shell Card	FleetCor Technologieën B.V.	Darren Pascoe	dpo@fleetcor.nl	P.J. Oudweg 4, 1314CH Almere.
	TravelCard	TravelCard B.V.	Darren Pascoe	dpo@fleetcor.com	P.J. Oudweg 4, 1314CH Almere.
	Tankpas.nl	Travelcard B.V.	Darren Pascoe	dpo@fleetcor.com	P.J. Oudweg 4, 1314CH Almere.
Poland	Shell Card, Allstar Mondo, FLEETCOR Carnet, Shell Card Plus Business	FleetCor Poland sp. z o.o.	Darren Pascoe	daneosobowe@fleetcor.pl	Generation Park Z ul. Towarowa 28, 00-839 Warszawa.
	Transit Card	Transit Card International Polska Sp. z o.o.	Darren Pascoe	daneosobowe@fleetcor.pl	Al. Solidarności 117/606, 00-140 Warszawa.
Slovakia	CCS Bonus Fleet, CCS Bonus	CCS Slovenská spoločnosť pre platobné karty	Darren Pascoe	dpo@fleetcor.sk	Galvaniho 15/C Bratislava - Ružinov 821 04.

	Plus, CCS Bonus, CCS Carnet, CCS Limit Exclusive, CCS Limit Plus, CCS Limit, CCS Toll & UTA/CCS card	s.r.o.			
	Shell Card	FleetCor Slovakia s.r.o.	Darren Pascoe	dpo@fleetcor.sk	Galvaniho 15/C Bratislava - Ružinov 821 04.
Switzerland	Shell card	Venturo Technologien Swiss GmbH	Darren Pascoe	dsb@fleetcor.ch	c/o Silvia Margraf Advokatur und Notariat, Industriestrasse 47, 6300 Zug.
United Kingdom	1link Services	Epyx Limited	Darren Pascoe	dpo@fleetcor.com	Heath Farm Hampton Lane, Meriden, Coventry, CV7 7LL.
	Allstar Expense, Allstar Monitor Allstar One, Allstar Plus (Vehicle Restricted) Allstar Plus Monitor, Allstar One, Allstar Plus, Allstar Supermarket+, Allstar Prepaid, Allstar Premier Programme, Allstar Classic, Allstar Supermarket	Allstar Business Solutions Limited	Darren Pascoe	dpo@fleetcor.com	Allstar Business Solutions Limited, PO BOX 1463, Windmill Hill, Whitehill Way, Swindon, SN5 6PS.
	Allstar Universal, Diesel Advance, Esso	The Fuelcard Company UK Limited	Darren Pascoe	dpo@fleetcor.com	Unit 3 St James Business Park, Grimbald Crag Court,

	Commercial, Esso Multi, Esso Single, Shell Fleet List, Shell Multi, Shell CRT, Shell Single Texaco and Fastfuel				Knaresborough, North Yorkshire, HG5 8QB.
	Fuelvend, Keyfuels and MYFUEL	C H Jones Limited	Darren Pascoe	dpo@fleetcor.com	Unit 3 St James Business Park, Grimbald Crag Court, Knaresborough, North Yorkshire, HG5 8QB.
	R2C Services	R2C Online Limited	Darren Pascoe	dpo@fleetcor.com	2 Vantage Drive, Sheffield, S9 1RG

If your country of residence has a data protection authority, you have a right to contact it with any questions or concerns. If we cannot resolve your questions or concerns, you also have the right to seek judicial remedy before a national court.

Updates to this privacy policy

We will update this policy from time to time to reflect changes in our business. We will inform you of these changes as required under applicable laws.

Fleetcor Europe Privacy Policy (Long Form)

This policy was last updated on 26 October 2020.

At Fleetcor Technologies, Inc., through our affiliates operating the Allstar, epyx, Fleetcor, The Fuelcard Company, Keyfuels, r2c, Travelcard, Transit card, Tankpas.nl and CCS brands, and servicing the Shell fuel card (collectively, “Fleetcor”, “we”, “our” or “us”), we respect your privacy. We have implemented this privacy policy to outline how Fleetcor uses personal data relating to its customers, prospective customers, fuel card holders, web users and other individuals who interact with us.

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Information we collect

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- Contact information
- Login details
- Financial information
- Content you provide to us
- Technical information about your device and website usage
- Transaction history
- Information about your characteristics and preferences
- Vehicle registration numbers and location

- Information including your ID – date of issue, expiry, number, issuing body and address (for identification purposes).

Contact information

If you are a customer of ours, a card holder or otherwise interact with us (e.g. through our website) then we will collect certain basic contact information about you. This may include your name, postal address, email address, phone number and fax number.

In the event that you are a representative or employee of one of our customers then we may also collect the name of your employer/the company you represent, your role at the company and job title. If you are a customer of our vehicle tracking service then this may include the location of your vehicle and its journey history.

Login details

If you have an online account with us, then we will store your username and password in order to manage your access to our platforms.

Financial information

This may include your fuel card number, credit/debit card details, bank account information and details we collect about your credit status if we conduct a credit report.

Know your client information

This may include your date of birth and personal address, passport number, driving licence number and/or national insurance number.

If you are a director or beneficial owner of a prospective customer then we may capture and use your personal data to conduct credit and anti-money laundering checks.

Please bear in mind that we may collect and consult your personal data in public registers and public sources (e.g. via the internet) as part of the know your client process.

Content you provide to us

For instance, you may get in touch with us via our website or by telephone, we may email you or vice versa or you may send us feedback via a survey form.

Technical information about your device and website usage

If you use our website or mobile applications then we will install certain cookies and web beacons on your device. The details of how we use these technologies is further outlined in our [cookie policy](#).

Through cookies, web beacons and similar technologies we may collect details about your device, such as IP address, internet browser type and operating system. We may also collect information about your browsing activity, such as how you use our website, the pages you have visited, the date and time of each visit and the URLs of any websites that re-directed you to our website.

Transaction history

If you are a card holder, then we will collect records of your transactions on that card, including the location date and time of the transaction and the cost of the fuel, goods or services.

Location data

If you are a card holder, then we will collect information on the location of any transactions carried out on the card.

With your consent, we will access location-based information or collect location markers from your mobile device or based on your IP address. We will use this information to provide you with notifications related to our locations. We do not use this information to specifically locate you for any reason other than to provide you with the service. If you have allowed us to utilise your location information in the past and wish to revoke the permissions, please change the settings on your device.

Vehicle location data

Some of our services may involve the use of a vehicle telematics system. Some telematics systems provide us with use of, disclosure of or access to location information and mileage as permitted by law.

Use of the telematics system is subject to the terms and conditions and privacy policy posted by the applicable telematics systems provider.

Information about your characteristics and preferences

We may collect certain details about you and your preferences (as a prospective customer, customer and/or card holder). This may include your purchasing behaviour and preferences.

How we collect your information

We use different methods to collect data from and about you, depending upon the nature of our relationship. This may include through direct interactions we have with you, through the use of automated technologies (e.g. cookies) and from your employer, third parties or publicly available sources.

Direct interactions

You may provide us with your data by completing forms (e.g. through our website) or by corresponding with us by post, phone, email or otherwise. This includes data you provide when you:

- Apply for a product or service on our website or through one of our sales associates.
- Create an account on our websites.
- Sign up to receive information (e.g. subscribe to our email marketing list).
- Participate in promotions or surveys.
- Provide us with feedback.
- Otherwise communicate with us.

Automated technologies

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact the DPO.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or to employ you, or we may stop providing existing services to you.

As you interact with our website, we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

Third party or publicly available sources

We may receive personal data about you from various third parties and public sources, including financial institutions and payment processors, credit reference agencies, credit institutions and commercial information services. For further details about the third parties that Fleetcor may collect and provide your personal data to see the section of this privacy policy entitled "Data we share and receive".

How we use your data

Depending on the nature of our relationship with you, we may use your data to:

- Process an application for an account you apply for.
- Provide the services our customers have signed up for.
- Process your transactions.
- Administer your online account.
- Protect ourselves against fraud and money laundering, verify your identity and to detect, investigate and prevent crime.
- Carry out checks in relation to your creditworthiness.
- Provide you with information about our products and services.
- Allow you to participate in interactive features e.g. via the website such as via our live chat function.
- Operate, evaluate and improve our business.
- Perform analysis (including anonymisation) of your data.
- Comply with our legal obligations, applicable industry standards and our policies.
- Administer the contracts with our customers, including to update contracts and to correspond with our customers about our services and the contracts.
- Other ways which we notify you of at the time of its collection or use.

The table below sets out further information about the purposes for which we use data about you, with the corresponding categories of data processed in each case and the legal basis that we rely upon for its use.

Purpose	Categories of data processed and legal basis for processing
<p>Process an application for a customer account</p> <ul style="list-style-type: none"> ▪ Initiate applications for accounts you request, notify you of the application 	<p>Categories of data processed</p> <ul style="list-style-type: none"> ▪ Contact information ▪ Financial information

<p>status or request additional information in relation to your application.</p> <ul style="list-style-type: none"> Obtain know your client and credit information when you apply for a product or subsequently. 	<ul style="list-style-type: none"> Know your client information <p>Legal basis</p> <p>It is in our legitimate business interests to process your personal data as part of the customer application process.</p>
<p>Provide the services our customers have signed up for</p> <ul style="list-style-type: none"> In order for our customers to receive the service(s). 	<p>Categories of data processed</p> <ul style="list-style-type: none"> Contact information Financial information Know your client information <p>Legal basis</p> <p>It is in our legitimate business interests and in the legitimate business interests of our customers to process your personal data as part of the customer application process and as part of the services, including to correspond with you about the contract and the services being provided to our customers.</p>
<p>Process your card transactions</p> <ul style="list-style-type: none"> We will use your contact information and unique fuel card identifiers to process fuel card payments when you purchase fuel. We will keep a record of your transaction history information relating to your card in order to calculate the fees owed to us by you and/or your employer and provide them with evidence of the transactions. 	<p>Categories of data processed</p> <ul style="list-style-type: none"> Contact information Financial information Transaction history <p>Legal basis</p> <p>It is our legitimate business interest to provide the fuel card services that we are contracted to perform in our contract with our customers.</p>
<p>Administer our customer's online accounts</p> <ul style="list-style-type: none"> Allow us to authenticate your user credentials when you login to your online account. Respond to enquiries you may make in relation to your account. Allow you to access certain information about your account with us, such as your transaction history. 	<p>Categories of data processed</p> <ul style="list-style-type: none"> Contact information Login details Transaction history <p>Legal basis</p> <p>It is in our legitimate interests to administer and manage the account of our customer as provided for under our contract with our customer.</p>
<p>Protect ourselves against fraud and money laundering, verify your identity and to detect, investigate and prevent crime.</p>	<p>Categories of data processed</p> <ul style="list-style-type: none"> Contact information Transaction history

<ul style="list-style-type: none"> ▪ Review and monitor your transaction history to identify any potential fraud, money laundering or other unlawful behavior in relation to your account. ▪ Carry out know your client and sanctions checks on a request basis. ▪ If fraud is detected, you could be refused certain services. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by https://www.cifas.org.uk/fpn. 	<ul style="list-style-type: none"> ▪ Financial information ▪ Know your client information <p>Legal basis</p> <p>It is necessary for compliance with legal obligations to which we are subject to.</p>
<p>Provide you with information about our products and services</p> <ul style="list-style-type: none"> ▪ If you have requested to receive such information from us, then we may contact you from time to time by email, post, telephone and/or SMS about our products and services and any products and services of third parties. 	<p>Categories of data processed</p> <ul style="list-style-type: none"> ▪ Contact information ▪ Transaction history <p>Legal basis</p> <p>We will only send you information about our products and services if you have consented to receiving them or based on our legitimate interests (where we are permitted to do so under applicable law).</p>
<p>Allow you to participate in interactive features</p> <ul style="list-style-type: none"> ▪ If you interact with the “chat” function on our websites. ▪ If you interact with us via our Facebook, Twitter or Linked In accounts. 	<p>Categories of data processed</p> <ul style="list-style-type: none"> ▪ Contact information ▪ Information about your characteristics and preferences <p>Legal basis</p> <p>It is our legitimate business interest to provide such features which you may choose to take up for your enjoyment and convenience.</p>
<p>Operate, evaluate and improve our business, products and services</p> <ul style="list-style-type: none"> ▪ Recording of telephone calls and online chats that we have with you for training or quality assurances. ▪ Monitor the use of and improve our interactive assets. ▪ Perform data analyses (including anonymisation) of your data. 	<p>Categories of data processed</p> <ul style="list-style-type: none"> ▪ Contact information ▪ Transaction history ▪ Content you provide to us ▪ Technical information about your device and website usage ▪ Information about your characteristics and preferences <p>Legal basis</p> <p>It is our legitimate business interest to review and improve our business, products and</p>

	<p>services to ensure that customer satisfaction is as high as possible. We will conduct data analyses (including benchmarking and reporting to enable us to do so).</p>
<p>To share information with third parties</p> <ul style="list-style-type: none"> See the section entitled “Data we share and receive” and “Credit Reference Agencies” for more information. 	<p>Categories of data processed</p> <ul style="list-style-type: none"> All personal data we hold about you <p>Legal basis</p> <p>It is our legitimate business interest to share your personal data with trusted third parties. We may share your personal data with third parties who provide us with services relevant to our business, such as those outlined in the “Data we share and receive” section of this privacy policy and with credit reference agencies as detailed in the “Credit Reference Agencies” section of this privacy policy.</p> <p>In the case of third party marketing we only share your personal data if you have provided consent.</p>
<p>Comply with our legal obligations, applicable industry standards and our policies</p> <ul style="list-style-type: none"> To audit compliance with our legal obligations including regulatory requirements. 	<p>Categories of data processed</p> <ul style="list-style-type: none"> All personal data we hold about you <p>Legal basis</p> <p>It is necessary for compliance with legal obligations to which we are subject.</p>
<p>Administer the contracts with our customers, including to update and to correspond with our customers about our services and the contracts</p> <ul style="list-style-type: none"> To provide contract updates and service(s) updates 	<p>Categories of data processed</p> <ul style="list-style-type: none"> All personal data we hold about you <p>Legal basis</p> <p>It is in our legitimate business interests and those of our customers to correspond with our customers (via you) in relation to their contract, any updates to such contracts (whether to reflect updates to the services or the law) and to correspond with them about the services.</p> <p>It is necessary for compliance with legal obligations to which we are subject.</p>
<p>Defend ourselves against or issue legal claims</p> <ul style="list-style-type: none"> We may keep records of your data, such as your transactions for evidential purposes in order to defend ourselves 	<p>Categories of data processed</p> <ul style="list-style-type: none"> Contact information Login details Content you provide to us

<p>against or issue one or more future legal claims.</p>	<ul style="list-style-type: none"> ▪ Transaction history <p>Legal basis</p> <p>It is our legitimate business interest to defend ourselves against and issue legal claims.</p>
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We may also share your personal data with third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, along with its professional advisers.

If we use your personal data in ways that are not described above, we will provide you with notice of this before doing so.

Data we share and receive

We do not sell or otherwise disclose your data, except as described in this privacy policy. We may share your data with the following parties:

- Other members of the [Fleetcor group](#).
- If you are a fuel card holder, we will share transaction history and data usage information with your employer/the company you represent.
- If you are a 1Link user, other subscribers of 1Link services.
- Providers of transaction services, such as card issuers, merchants, payment processors and other suppliers to assist with the transactions and administration of the fuel card services.
- Marketing and data analytics companies.
- Our commercial partners who sell similar products and services.
- Partners who provide features on our websites.
- IT suppliers.
- Risk and fraud prevention agencies and monitoring providers.
- Credit reference agencies.
- Our insurers and professional advisers.
- Regulators and other government agencies including, but not limited to, public authorities, regulators, the police and other law enforcement agencies.
- Any company to whom we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, along with its professional advisers.

We do not authorise any third parties that we share data with to use or disclose your data except as necessary to perform certain services on our behalf, to comply with legal requirements or as detailed under the Credit Reference Agencies section of this policy. We require these third parties, through our

contractual arrangements with them, to appropriately safeguard the privacy and security of the data they process on our behalf.

We may also receive data about you from the following third parties:

- Social media platforms.
- Your employer.
- Credit reference agencies: information relating to credit score/suitability for products.
- Data brokers.
- Our commercial partners.
- Public databases.
- Regulators and other government agencies.

If you would like to receive a full list of our suppliers and other third parties who we share your data with or receive your data from then you can get in touch with us using the details provided in the section “How to reach us?”.

Credit Reference Agencies

In order to process applications we will supply personal information you provide to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. 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.

CRAIN (Credit Reference Agency Information Notice) is a document produced by the three Credit Reference Agencies- Experian, Equifax and TransUnion (formerly Callcredit)- that explains the use of personal data they receive from third parties about individuals and/or their businesses in relation to credit activity. CRAIN has been produced in conjunction with the Information Commissioner’s Office (ICO).

The CRAIN, the identities of the CRAs and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>.

Where your data may be sent

As with any multinational organisation, we are often required to transfer data internationally. Accordingly, your personal data may be transferred globally (if your data is collected within the European Union, this means that your data may be transferred outside of it). This includes transfers that have been identified in the previous section “Who do we share your data with and for what purposes”.

When using personal data as described in this privacy policy, it may be transferred either within or outside the country or territory where it was collected, including to a country, territory or international organisation that may not have EU equivalent data protection standards.

For example, we may transfer your personal data to our vendors based outside the European Union. In all cases, the transfer will be on the basis of a [European Commission adequacy decision](#) or we will implement adequate measures, for example the [EU Model Contracts](#), and including appropriate security measures, for the protection of personal data in those countries, territories or international organisations in accordance with applicable data protection laws. If you would like more information about any of the data transfer measures on which we rely please contact us using the details provided in the section “How to reach us”?

How we keep your information secure

Fleetcor will take appropriate technical and organisational security measures to secure your personal data and to protect it from loss, misuse or alteration. Personal data that we hold about you is stored on our secure servers or those of our appointed suppliers. Our web pages that collect your data are secured with Secured Socket Layers (SSLs).

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share this password with anyone.

Fleetcor maintains an information security program that is designed to:

- Secure and maintain confidentiality of your personal data.
- Protect against anticipated threats or hazards to security or integrity of your data.
- Protect against unauthorised access to or use of your data that could result in substantial harm or inconvenience to you or your entity if compromised.
- Comply with applicable laws.

How long we may keep your data

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, 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.

Details of retention periods for different aspects of your personal data can be requested by contacting the DPO.

In some circumstances you can ask us to delete your data, please see “Your Rights and Choices”.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with or be used to identify you) for research or statistical purposes in which case we may use such data indefinitely without further notice to you.

Children’s privacy

Fleetcor’s websites are not intended for use by children, especially those under the age of 18. No one under the age of 18 should provide any personal data or participate in any forums, chats, or online discussions. Minors under the age of 18 are prohibited from applying for emails, newsletters and/or products or services, on our websites. If we identify that we have received any such personal data we will delete it.

Your rights and choices

You may have some or all of the following rights in respect of personal data about you that we hold:

- Request us to give you access to it.
- Request us to rectify it, update it, or erase it.
- Request us to restrict our using it, in certain circumstances.
- Object to our using it, in certain circumstances.
- Where legally possible, withdraw your consent to our using it.
- Data portability, in certain circumstances.
- Opt out from or object to our using it for direct marketing.
- Lodge a complaint with the supervisory authority in your country (if there is one).

You are able to exercise these rights by contacting us using the details set out at in the “How to reach us” section below.

Please visit our [cookie policy](#) to learn about how you can also exercise your rights in relation to our use of cookies, web beacons and similar technologies.

You have the rights set out in the table below:

Right in respect of the data about you that we hold	Further detail (note: certain legal limits to all these rights apply)
<ul style="list-style-type: none"> • To request us to give you access to it 	<p>This is confirmation of:</p> <ul style="list-style-type: none"> • whether or not we process data about you; • our name and contact details; • the purpose of the processing; • the categories of data concerned; • the categories of persons with whom we share the data and, where any person is outside the EU and does not benefit from a European Commission adequacy decision, the appropriate safeguards for protecting the data; • (if we have it) the source of the data, if we did not collect it from you; • (to the extent we do any, which will have been brought to your attention) the existence of automated decision-making, including

Right in respect of the data about you that we hold	Further detail (note: certain legal limits to all these rights apply)
	<p>profiling, that produces legal effects concerning you, or significantly affects you in a similar way, and information about the logic involved, as well as the significance and the envisaged consequences of such processing for you; and</p> <ul style="list-style-type: none"> the criteria for determining the period for which we will store the data. <p>On your request we will provide you with a copy of the data we hold.</p>
<ul style="list-style-type: none"> To request us to rectify or update it 	<p>This applies if the data we hold is inaccurate or incomplete.</p>
<ul style="list-style-type: none"> To request us to erase it 	<p>This applies if:</p> <ul style="list-style-type: none"> The personal data we hold is no longer necessary in relation to the purposes for which we use it; we use the data on the basis of your consent and you withdraw your consent (in this case, we will remember not to contact you again, unless you tell us you want us to delete all personal data about you in which case we will respect your wishes); we use the data on the basis of legitimate interests and we find that, following your objection, we do not have an overriding interest in continuing to use it; the data was unlawfully obtained or used; or to comply with a legal obligation.
<ul style="list-style-type: none"> To request us to restrict our processing of it 	<p>This right applies, temporarily while we look into your case, if you:</p> <ul style="list-style-type: none"> contest the accuracy of the personal data we use; or have objected to our using the personal data on the basis of legitimate interests <p>(if you make use of your right in these cases, we will tell you before we use the data again).</p> <p>This right applies also if:</p> <ul style="list-style-type: none"> our use is unlawful and you oppose the erasure of the data; or we no longer need the data, but you require it to establish a legal case.
<ul style="list-style-type: none"> To object to our processing it 	<p>You have two rights here:</p> <ul style="list-style-type: none"> if we use data about you for direct marketing: you can “opt out” (without the need to justify it) and we will comply with your request; and if we use the data about you on the basis of legitimate interest for purposes other than direct marketing, you can object to our using it for those purposes, giving an explanation of your particular situation, and we will consider your objection.
<ul style="list-style-type: none"> To withdraw your consent to our using it 	<p>This right applies to any data which we have collected and process based on your consent.</p> <p>You have the right at any time to withdraw the consent you have provided to us.</p>
<ul style="list-style-type: none"> To data portability 	<p>This right applies:</p> <ol style="list-style-type: none"> to personal data that you have provided to us; and if we use that data on the basis either of your consent, or on the basis of discharging our contractual obligations to you.

Right in respect of the data about you that we hold	Further detail (note: certain legal limits to all these rights apply)
	If both (i) and (ii) apply, you have the right to receive the data back from us in a commonly used format, and the right to require us to transmit the data to someone else if it is technically feasible.
<ul style="list-style-type: none"> To lodge a complaint with the supervisory authority in your country 	<p>Each European Union country must provide for one or more public authorities for this purpose.</p> <p>You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm</p>

How to reach us

If you have any questions about our privacy policy, including any requests to exercise your legal rights in relation to the data we hold on you, then please contact the relevant DPO using the details set out below:

Country	Product	Data Controller	DPO	Email Address	Postal Address
Austria	Shell card	FleetCor Tankkarten GmbH	Darren Pascoe	dsb@fleetcor.at	Teinfaltstraße 8/4, 1010 Wien.
Belgium	Shell card	FleetCor Belgium Srl	Darren Pascoe	dpo@fleetcorcords.be	Avenue Du Port 86c/204, 1000 Bruxelles.
	Shell card	FleetCor Belgium bv	Darren Pascoe	dpo@fleetcorcords.be	Havenlaan 86c Bus 204, 1000 Brussel.
	TravelCard	Travelcard B.V.	Darren Pascoe	dpo@fleetcorcords.be	Rue de Colonies 11, 1000 Brussel.
Czech Republic	Shell card	FleetCor Czech Republic s.r.o.	Darren Pascoe	dpo@fleetcor.cz	Voctářova 2500/20a, 180 00 Praha 8.
	CCS Bonus Fleet, CCS Bonus Plus, CCS Bonus, CCS Carnet CCS Limit Exclusive, CCS Limit Plus, CCS Limit,	CCS Česká společnost pro platební karty s.r.o	Darren Pascoe	dpo@fleetcor.cz	Voctářova 2500/20a, 180 00 Praha 8.

	CCS Toll and UTA/CCS card				
Denmark	1link Services	epyx Limited	Darren Pascoe	dpo@fleetcor.com	Heath Farm Hampton Lane, Meriden, Coventry CV7 7LL, United Kingdom.
France	1link Services	Epyx France SAS	Darren Pascoe	dpo@fleetcor.com	35 Allée des Impresssioniste s, Le Cézanne, 93420 Villepinte.
	Shell Card	Epyx France SAS	Darren Pascoe	dpo@fleetcor.fr	35 Allée des Impresssioniste s, Le Cézanne, 93420 Villepinte.
Germany	Shell Card	FleetCor Deutschland GmbH	Darren Pascoe	dsb@fleetcor.de	Frankenstraße 150 c, 90461 Nürnberg.
Hungary	Shell Card	FleetCor Hungary Kft	Darren Pascoe	adatvedelem@fleetcor.hu	1062 Budapešť, Andrássy út 100.
Ireland	1link Services	epyx Limited	Darren Pascoe	dpo@fleetcor.com	Heath Farm Hampton Lane, Meriden, Coventry CV7 7LL, United Kingdom.
Lithuania	Transit Card	UAB Transit Card International	Darren Pascoe	dpo@fleetcor.lt	Mindaugo g. 44- 82, LT-01311, Vilnius.
Luxembourg	Shell Card	Venturo Technologies s.a.r.l.	Darren Pascoe	dpo@fleetcor.lu	46A, avenue J.F. Kennedy, L- 1855, Luxembourg.
Netherlands	Shell Card	FleetCor Technologieën B.V.	Darren Pascoe	dpo@fleetcor.nl	P.J. Oudweg 4, 1314CH Almere.
	TravelCard	TravelCard B.V.	Darren Pascoe	dpo@fleetcor.com	P.J. Oudweg 4, 1314CH Almere.
	Tankpas.nl	Travelcard B.V.	Darren Pascoe	dpo@fleetcor.com	P.J. Oudweg 4, 1314CH Almere.
Poland	Shell Card, Allstar Mondo, FLEETCOR Carnet,	FleetCor Poland sp. z.o.o.	Darren Pascoe	daneosobowe@fleetcor.pl	Generation Park Z, ul. Towarowa 28, 00-839 Warszawa.

	Shell Card Plus Business				
	Transit Card	Transit Card International Polska Sp. z o.o.	Darren Pascoe	daneosobowe@fleetcor.pl	Al. Solidarności 117/606 00-140 Warszawa.
Slovakia	CCS Bonus Fleet, CCS Bonus Plus, CCS Bonus, CCS Carnet, CCS Limit Exclusive, CCS Limit Plus, CCS Limit, CCS Toll and UTA/CCS card	CCS Slovenská spoločnosť pre platobné karty s.r.o.	Darren Pascoe	dpo@fleetcor.sk	Galvaniho 15/C Bratislava - Ružinov 821 04.
	Shell Card	FleetCor Slovakia s.r.o.	Darren Pascoe	dpo@fleetcor.sk	Galvaniho 15/C Bratislava - Ružinov 821 04.
Switzerland	Shell card	Venturo Technologien Swiss GmbH	Darren Pascoe	dsb@fleetcor.ch	c/o Silvia Margraf Advokatur und Notariat, Industriestrasse 47, 6300 Zug.
United Kingdom	1link Services	Epyx Limited	Darren Pascoe	dpo@fleetcor.com	Heath Farm Hampton Lane, Meriden, Coventry, CV7 7LL.
	Allstar Expense, Allstar Monitor Allstar One, Allstar Plus (Vehicle Restricted) Allstar Plus Monitor, Allstar One, Allstar Plus, Allstar Supermarket+, Allstar Prepaid,	Allstar Business Solutions Limited	Darren Pascoe	dpo@fleetcor.com	Allstar Business Solutions Limited, PO BOX 1463, Windmill Hill, Whitehill Way, Swindon, SN5 6PS.

	Allstar Premier Programme, Allstar Classic, Allstar Supermarket				
	Allstar Universal, Diesel Advance, Esso Commercial, Esso Multi, Esso Single, Shell Fleet List, Shell Multi, Shell CRT, Shell Single Texaco and Fastfuel	The Fuelcard Company UK Limited	Darren Pascoe	dpo@fleetcor.com	Unit 3 St James Business Park, Grimbald Crag Court, Knaresborough, North Yorkshire, HG5 8QB.
	Fuelvend, Keyfuels and MYFUEL	C H Jones Limited	Darren Pascoe	dpo@fleetcor.com	Unit 3 St James Business Park, Grimbald Crag Court, Knaresborough, North Yorkshire, HG5 8QB.
	R2C Services	R2C Online Limited	Darren Pascoe	dpo@fleetcor.com	2 Vantage Drive, Sheffield, S9 1RG

If your country of residence has a data protection authority, you have a right to contact it with any questions or concerns. If we cannot resolve your questions or concerns, you also have the right to seek judicial remedy before a national court.

Updates to this privacy policy

We will update this policy from time to time to reflect changes in our business. We will inform you of these changes as required under applicable laws.