

1. Who looks after your Personal Information?

This website 247smartdrive.co.uk and any subdomains (the "Service") is operated by 247 Stay Green Limited, with the mailing address of Parkhill Business Centre, Padiham Road, Burnley BB12 6TG (hereinafter, "We", "Us", or "Our"). 247 Stay Green Limited is the data controller of your Personal Information in the context of the Service.

2. What is a Privacy Notice?

This Privacy Notice ("Notice") describes how We will process and protect personal information relating to an identified or identifiable individual ("Personal Information") when you use the Service.

We also use the Personal Information to provide Our product & services to you, to communicate with you, and to track usage of the Service and Our products and services.

Your Personal Information shall be held and used in accordance with applicable legislation relating to the protection of Personal Information (the "Applicable Law").

This Notice sets out more details of what data we collect from you and why including details of your data protection rights.

This Notice may be updated from time to time, and We ask that you read through this notice and should you have any further queries please do not hesitate in contacting us by email at privacy@247smartdrive.co.uk or by telephone on 0333 358 2247.

3. Cookie Policy

Cookies are text files on your computer which collect internet log data. When you visit Our website, We collect data regarding how you use and navigate Our Service (for example, the pages that you view and links that you click and observing your browsing and purchasing habits or your interactions with us through live chat).

We use cookies to help Us recognise you, improve your experience, increase security, and measure use and effectiveness of Our services. This data enables us to improve Our website and deliver a personalised service to you. For example, they enable us to keep track of what may be of interest to you.

Our system will issue cookies when you visit our website and by utilising our website you agree to this.

4. When do we collect your Personal Information and what do we collect?

Reason/Purpose	Personal Data Used
When you request a quotation	We ask you to provide information about yourself (such as personal contact details)
When you make a purchase	We ask individuals to provide Us with their full name, contact details (for example postal address, telephone number, email address)

	banking information (for example bank name, sort code, account number), date of birth.
When you create an account	We ask users to provide Us with their full name, contact details (for example - email address), date of birth. We will also collect your Internet Protocol ("IP") address.
When you make a payment	Payment details: cardholder name, payment or debit card number, CVC, and expiry date. We do not store any of this information on our system. Call recordings are paused when card payments are taken.
When you contact us	We will collect information that you provide to Us in your communications (such as the query or issue that you have raised, information relating to your existing plan and if you are communicating with Us about a repair or payment card information). We will also collect your responses to surveys about Our services and the Service if you choose to participate.
When you use our Website	This includes IP address, operating system and version, browser used and version, language preferences, time zone, screen settings and site visited before arriving on Our Website.
Marketing & Advertising	Information about how you respond and liaise with any advertising or marketing communications together with any requests made objecting to receive such communications. If you don't complete your purchase, We may remind you of what you were viewing by email or telephone.

5. Why do we collect your Personal Information?

We process your Personal Information for the following purposes:

5.1 To fulfil a contract or take steps linked to a contract: this is relevant where you have entered or are taking steps to enter into a contract with Us or where you submit a repair request.

5.2 As required by Us to conduct Our business and pursue Our legitimate interests (this means the interest of Us in conducting and managing our business. This allows Us to give you the best products, services and security. We make sure We consider and balance any potential impact on you as well as your rights before We process your personal data for our legitimate interests), **in particular:**

We will use your Personal Information to provide:	the Service and other products and services that you have requested, to communicate with you and to respond to any comments, queries or complaints you may send Us
We will use your Personal Information to monitor:	use of the Service and use your Personal Information to help Us to track and analyse preferences and trends,

	evaluate possible new features, functionality, services, offer new products and improve Our Service.
We will use your Personal Information to recognise:	you on the Service, improve your experience, increase security of Our networks and systems, and measure use and effectiveness of Our Service.
We will use your Personal Information to investigate:	complaints received from you or from others, about the Service or Our products and services. We also use this
	Personal Information to track potential issues (for example, issues with fulfilment of services) and trends to better serve you
We will use your Personal Information to:	To provide and fulfil the Service and offer you other products and services you have requested. This includes make decisions about, and to effect, reorganisations or sales of all or part of Our business. We will also remind you about items that you have viewed which may still be of interest to you.
We monitor:	customer accounts to prevent, investigate and/or report fraud, misrepresentation, or crime, in accordance with Applicable Law
We will use Personal Information in connection with:	legal claims (for example, relating to rejection of a repair request), compliance, regulatory and investigative purposes (for example, theft and fraud investigations) as necessary (including disclosure of such information in connection with legal process or litigation)
We use Personal Information of:	some individuals to invite them to take part in market research and customer surveys
We will use your Personal Information to:	send you information about 247StayGreen Limited and other group companies such as 247 Staywarm Limited's products and services, such as customer experience surveys (where your consent is not required).

5.3 Also:

For purposes which are required by law:	<ul style="list-style-type: none"> ☐ In response to requests by government or law enforcement authorities conducting an investigation; and ☐ Responding to complaints where We are under an obligation to adhere to a complaint handling procedure.
--	---

5.4 Automated Decision Taking

In certain circumstances, decisions about you will be taken by solely automated means:

- Providing you with a quote: Where you request a quote from Us, such as for a new charger installation, information such as your current level of cover and your new charger are processed to determine whether the requested changes can be made to your plan and, if so, whether an additional charge is necessary.
- Automatic Renewal at the end of your 12-month period unless you cancel the plan.
- Repair Request: Reporting of your repair request via Our online portal.
- If you do not agree with the result of a decision taken by solely automated means, you can request human review of the decision, express your point of view, and obtain an explanation of the decision and challenge it. If you wish to do so, please contact us.

6. Who do We share your Personal Information with?

24|7 SmartDrive is a trading style of 247StayGreen Limited, which is part of a group. Ventureprise PLC is the parent company. Other group companies include 247 Stay Green Limited, 247 StayWarm Limited and Home Response 360 Limited. From time to time, we may share your personal information with companies within the group for marketing, sales and repair requests.

Disclosure to 3rd parties	We will disclose your Personal Information to 3rd parties for the purpose of performing tasks that directly relate to the provision of the Service and repair requests.
Disclosure to Our Service Providers and Partners	We employ third party companies and individuals to facilitate the Service (in particular, third parties assist Us with customer support, the customer chat function on Our Website, communications, audit, application or database hosting, development, logistics, payment processing, other products (for example, manufacturers and engineers), and fraud detection and prevention. These third parties have access to your Personal Information to perform these tasks on Our behalf and are obligated to Us. The personnel of such third parties who use your Personal Information is limited to those individuals which are authorised to do so on a need-to-know basis and as necessary to provide these business services to Us. To fulfil any repair request you make We may share your name, contact details (including postal address, email address and mobile number), and reference of your covered product with the manufacturer, engineer or a sub-contractor. We may also share your name and contact details as necessary. We may also share your information with Our affiliates such as Home Response 360 Ltd who are an authorised representative whose activities relate to repair requests. We do not authorise such third parties to disclose or use this Personal Information for other purposes.

Disclosure to Public Authorities	We may disclose your Personal Information if required for the purposes above, if mandated by law or if required for the legal protection of Our legitimate interests in compliance with Applicable Law.
Other Categories of Recipients	<p>We may also disclose your Personal Information, usage information, and other information about you to parties acquiring part or all of Our assets, as well as 3rd parties. This includes our payment processor Bottomline & Stripe which is an online payment processing platform when taking payment for the services We offer.</p> <p>Also, if any bankruptcy or reorganisation proceeding is brought by or against Us, your Personal Information may be considered a company asset that may be sold or transferred to third parties.</p>

7. Where is your Personal Information processed?

We use third parties located in other countries to help us run our business. As a result, personal data may be transferred outside the countries where we and our customers are located. This includes countries that do not have laws that provide specific protection for personal data. We have taken and continue to take steps to ensure all personal data is provided with adequate protection. Where We transfer personal data outside of the EEA to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

8. What are your Rights and Choices about your Personal Information?

You are entitled to exercise your rights to the following:

- Request a copy of all your personal data We have in Our possession (subject access requests)
- Correct any data that appears to be incorrect.
- Your Right for your personal data to be erased (right to be forgotten)
- Object to receiving marketing and advertising communications.
- Withdraw Consent that you have previously provided to us.

Should you wish to exercise any of your rights, please contact us by email on privacy@247smartdrive.co.uk

In certain situations, and subject to Applicable Law, We may not be able or obliged to comply with part or all of your individual requests. For example, We may not comply with an access request if doing so would reveal Personal Information about another person or comply with a deletion request relating to information which We are required by law to keep or have compelling legitimate interests in keeping.

Please note that We have the right to refuse requests which are manifestly unfounded or excessive (for example, due to their repetitive character). Relevant exemptions are included in both the UK GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions We rely upon when responding to any request you make.

If you have unresolved concerns, you have the right to complain to the UK Information Commissioner's Office (ICO) who are the UK's data protection authority where you believe a breach may have occurred. You can contact the ICO on 0303 123 1113 or alternatively start a live chat at <https://ico.org.uk/make-a-complaint/>

9. How do we communicate with you?

We communicate with you through telephone, email and SMS. We will send you service-related communications (for example "we have attempted to contact you..."), marketing and promotional messages (with your consent if required), customer satisfaction and market research surveys.

You can change your email, SMS and contact preferences by contacting us by email at customerservices@247smartdrive.co.uk or by telephone on **0333 358 2247**.

10. Holding your Personal Information

We retain the Personal Information you provide as needed to provide the Service as follows:

- We maintain logs and backups for security, debugging and site stability purposes for up to 24 months post cancellation including any communications that you send to Us in connection with performing a contract (for example, via email and the chat functionality).
- For legal and regulatory purposes for up to 6 years.
- Telephone call recordings which are utilised for training and monitoring purposes are stored for up to 24 months.

11. How do We keep your Personal Information Secure?

We have implemented safeguards designed to protect your Personal Information in accordance with industry standards.

We have measures in place to restrict access to Personal Information to those individuals whom We know have a valid business purpose to have access to such data. We maintain physical, electronic and procedural safeguards. We follow generally accepted standards designed to protect the Personal Information submitted to Us, both during transmission and once We receive it. We require those who provide services for Us and to whom We provide Personal Information collected through the Service to keep such information secure and confidential. However, no method of transmission over the Internet or method of electronic storage is totally secure. Therefore, We cannot guarantee it's absolute security.

12. Important Information

12.1 Minimum Age

We do not knowingly collect Personal Information from anyone under the age of 18. You must be at least 18 years of age to use the Service.

12.3 Contact Us

For customer enquiries, please contact Us at 247 Stay Green Limited, Parkhill Business Centre, Padiham Road, Burnley, BB12 6TG, or by calling us on **0333 358 2247**.

We welcome your questions or comments regarding this Notice. Please write to us at Data Protection Officer, 247 Stay Green Limited, Parkhill Business Centre, Padiham Road, Burnley, BB12 6TG, email us on privacy@247smartdrive.co.uk or by calling us on **0333 358 2247**.