



## INSPIRE LEAD GENERATION LTD PRIVACY POLICY

As a data-related business, Inspire Lead Generation Ltd collects and process a large volume of personal data within our operation, as well as sharing data with clients and partners. We are strongly committed to ensuring our procedures and services comply with all UK and European data protection.

Every individual has certain rights in relation to their data, including the right to object to processing based on legitimate interests, profiling and direct marketing. As such, anyone can exercise their rights at any time by emailing [info@inspireleadgen.com](mailto:info@inspireleadgen.com). Further details about the principles established by Inspire Lead Generation Ltd to comply with its legal obligations and best protect the privacy of those whose data is collected and processed is available below.

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### ABOUT US

Inspire Lead Generation Ltd is located at Madison House, 1 Church Street, Reigate, Surrey RH2 0AA whose registered office address is La Pineda Upper Minety, Malmesbury, Wilts, SN16 9PR.



For the purposes of the General Data Protection Regulation (the “GDPR”), Inspire Lead Generation Ltd is the controller in relation to your data. We are registered as a controller with the UK Information Commissioner’s Office (ICO) under registration number ZB047033.

Our registration can be confirmed here: [www.ico.org.uk](http://www.ico.org.uk)

## ABOUT THE SITE & HOW IT WORKS

The Fleetscompare.co.uk website allows visitors to request tailored quotes for the product or service specified on this site. This means the primary service provided is to connect those looking to purchase the product or service with relevant suppliers.

When someone wants to receive quotes for a selected product or service they complete and submit the webform on the site. Once this request has been received, Fleetscompare.co.uk connects the person with one or more relevant suppliers. The supplier(s) will receive details of who the person is; their product/service requirement (including any relevant information captured by the webform); and they will then contact them directly with the asked for quote(s). Before connecting you with relevant suppliers, we may call you to confirm and qualify details or requirements.

The webform includes a consent statement, which sets out the number of suppliers that may be in contact following completion. There is no obligation to purchase and this choice lies firmly with the person completing the webform. All suppliers agree to respect the privacy rights of anyone making a request for quotes by keeping data secure and confidential, limiting their use of data (only providing a requested quote), and not sharing data with anyone else.

## DATA COLLECTION

What data we collect and how:

- **Webform** – when a webform is completed as part of a request for quotes, it will ask for contact details (name, email address, telephone number, postal address) as well as relevant information regarding individual product requirements.

- **IP Address** – we store and share Internet Protocol (IP) addresses, the unique number that all computers and devices have, which enables communication with other computers and devices over the Internet.
- **Telephone Calls** – call may be monitored and/or recorded for purposes of quality control and staff training. Also, suppliers may need to be provided with restricted access to a recording on occasions for dispute resolution purposes.
- **Other data capture** – additional data might be collected via any email, telephone or post communications.

## COOKIES

Cookies are small text files that are placed on your computer when you visit a website. The goal of cookies is to typically to make websites work, or work more efficiently, as well as to provide information to the owners of the site. This can include simplifying website navigation (automatic authentication or personalisation of information) or customise the adverts that appear when browsing.

Certain cookies are left by us when browsing the website. However, most web browsers allow some control of most cookies through the settings, so it is possible to oppose the use of these cookies at any time.

In compliance with all current legal requirements, before leaving or reading a cookie stored on a computer, we:

- Inform the user of the purpose of these cookies
- obtain their consent when required
- inform the user of the methods of refusal

Cookies and trackers that are necessary to provide a service expressly requested by the user do not need their prior consent. All other cookies require advance notification and consent request, which is received via a banner that appears on the website which contains the following information:

- the precise purpose of the cookies used
- the possibility of opposing these cookies and changing the settings by clicking on a “find out more and configure cookies” link found on the banner (with a reference to the current paragraph)
- the fact that, by continuing to use the site, the user agrees to Cookies being saved on their device

To learn more about cookies, including how to view what cookies have been set and how to manage/delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## DATA USAGE

We use collected data (as outlined above) in a number of ways:

- **Connecting with suppliers** – when a webform is completed and submitted, this request is shared in a secure way with one or more relevant suppliers. The relevant supplier(s) will then make contact by telephone, SMS and/or email, using any supporting data to provide an individual quote.

There may be some aspect of automated decision-making prior to passing a request to relevant suppliers. Requirements may be automatically assessed at the time a request is made, with data then passed on to relevant suppliers.

- **Webform reminder** – an email may be sent as a reminder for partially-completed webforms. However, inputted data will only be stored for 2 hours after leaving the webform, with all data permanently deleted after this time period if the process has not been completed.
- **Data confirmation** – we may call to confirm specific details or requirement before a request is passed onto to a relevant supplier. In addition, a call may be made to enquire about user experience of the site or connected supplier.



- **Products/services communications** – existing users of our service may be emailed or sent SMS messages regarding similar products and services that may be of interest. It is possible to opt-out of these communications and no such email or SMS message will be sent if this is the case.
- **Custom and similar audience creation** – we work with Google and other platforms to advertise our service proposition to new and existing users. As a result, user data can be used to develop a custom and/or similar audience. Whenever an audience is shared with a platform, the data is first hashed and pseudonymised, so any data within the audience that could identify a person is replaced with an artificial identifier. At no time do we share more data than is needed for the purpose of creating the audience.
- **Returned data from suppliers** – on occasions a supplier may return data to us as part of a query they need resolving or a confirmation about whether or not a product has been purchased. We may also use such data to create custom and similar audiences, as outlined above.
- **Third-party organisations** – we work with a number of external organisations – including cloud storage providers, email service providers and telephony providers – that process data on our behalf. We have appropriate agreements set up with each to make certain the protection and privacy of data.

## STORING DATA

Our data retention policy ensures that we only keep data for as long as is required to achieve the purpose/s for which it was collected (as outlined in the Privacy Policy). The storage period depends on the activity concerned, the nature of the contact (customer or potential customer) and the sector's use. In particular:

- We will keep all requests for quotes for a period of six months, so we have the information to resolve any queries from suppliers.
- We will keep personal details for email and SMS (excluding those that have opted out of receiving marketing messages) until such a time as we have had no engagement with our communications for 6 consecutive months.

- Following the time periods outlined above, we will not use the data, save that we will hash/anonymise the same, and retain it for a further 3 years for compliance purposes.
- We keep certain compulsory documents (invoices, etc.) for the duration of the legal storage period.
- Cookies expire thirteen months after their last update.

## LEGAL BASIS

The legal basis is the foundation for data processing under the General Data Protection Regulation (GDPR). It means that if an organisation wants to process personal data, there is a need to identify specific legal grounds for the processing. There are a number of options including:

- **CONSENT** – the individual has given clear consent for you to process their personal data for a specific purpose.
- **CONTRACT** – the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- **LEGAL OBLIGATION** – the processing is necessary for you to comply with the law (not including contractual obligations).
- **VITAL INTERESTS** – the processing is necessary to protect someone’s life.
- **PUBLIC TASK** – the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- **LEGITIMATE INTERESTS** – the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.

Our Privacy Policy sets out how data is used within the business. Under the GDPR, there must be a valid lawful basis for each processing activity that is undertaken:

Activity	Lawful Basis	User Rights
To connect users with relevant suppliers	CONSENT	To withdraw consent (see below)

Automated decision-making with regards to sharing data with relevant suppliers	LEGITIMATE INTERESTS	The right to object to processing based on legitimate interests
Using and sharing IP addresses	LEGITIMATE INTERESTS	The right to object to processing based on legitimate interests
To email users regarding a partially completed webform	LEGITIMATE INTERESTS	The right to object to processing based on legitimate interests
To call users to confirm personal details or requirements	CONSENT	To withdraw consent, as explained below
To call users to book an appointment	CONSENT	To withdraw consent, as explained below
Sharing call recordings with Service Providers	LEGITIMATE INTERESTS	To object to processing based on legitimate interests
To email or SMS message users about similar products and services	LEGITIMATE INTERESTS*	To object to processing based on legitimate interests. Also, the right to object to direct marketing
To create custom and similar audiences	LEGITIMATE INTERESTS	The right to object to processing based on legitimate interests
Receiving data from Service Providers	LEGITIMATE INTERESTS	The right to object to processing based on legitimate interests
To email or SMS message users with more information about the products or services they have expressed an interest in	CONSENT	To withdraw consent, by clicking the unsubscribe link in the email or SMS message as applicable.

\*Under the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), we send such emails on the basis of the existing customer (soft opt-in) exemption.

In each case where we have identified legitimate interests as the legal basis for our processing, we have conducted a legitimate interests assessment.

## USER RIGHTS

If a user resides in the European Economic Area or the United Kingdom, they have certain rights under GDPR in relation to their personal data. In relation to our site, and the service that we



provide, these rights are outlined above. Below is a further explanation regarding the rights of our website users:

- The right to be **informed** is about communicating with a user what we are doing with their data. This is provided in a Privacy Policy.
- The right of **access** is commonly known as a Subject Access Request. This is user's right to have a copy of their data that we hold on them.
- The right of **rectification** is a right to rectify data. In the event that data is not accurate a data subject has the right for this to be changed.
- The right of **erasure** is commonly known as the right to be forgotten. This right is for users to have their data removed at source from a device or site.
- The right to **restrict processing** of data covers all processing both internally within our business and with any third parties.
- A user has a legal right to **object** to the processing of their data.
- A user has the right to object to **automated decision making**.

## EXERCISING USER RIGHTS

All requests related to exercising rights of access, refusal, rectification, removal or to be forgotten should be sent by email to [info@inspireleadgen.com](mailto:info@inspireleadgen.com) Any request must include as much information as possible – specify the email address requested and to which address the requested information will be sent - to make the search easier. All requests will be handled within a maximum of two months of reception.

## PRIVACY POLICY CHANGES

We may update our Privacy Policy where appropriate. The version here represents our most up-to-date version and this replaces any earlier version. The Privacy Statement was last reviewed April 2021.