

## COMPANY POLICY/PUBLIC

# QSP-020 Client Customer Privacy Policy

Owner – Management Team

### **Policy Statement:**

e2e aims to comply with all applicable data protection laws when processing customer or client's personal information. e2e will safeguard personal information including measures covering data security, a person's rights regarding their data and the use and disclosure of data.

## 1. Purpose

1.1 At e2e we take our responsibilities to protect your privacy very seriously and recognise our responsibility to handle, manage and secure your data appropriately and legally. We operate in compliance with the European General Data Protection Regulation (GDPR) and Data Protection Act 2018 (UK).

1.2 This policy applies to all employees of End to End Total Loss Vehicle Management Limited (including subsidiaries) (together known as the 'Company').

## 2. Background

2.1 e2e are the Data Controller for the personal data provided by you through our website and e2e are the Data Processor for the supplier services we provide to our clients.

2.2 This privacy notice explains what you can expect when e2e total loss vehicle management collects and processes your personal information:

- We keep to a minimum the information we hold about you.
- We use your data to provide our services to you, meet our legal obligations, and improve our website.
- We delete your data when it is no longer needed.
- Generally, we do not give your information to third parties, unless to act on your behalf following an enquiry from you, or if required by English law.
- We use website cookies.
- We are happy to answer your questions about any of this.

### 2.3 ICO Registration

- e2e acts as a 'data controller' in relation to your personal data and is registered with the Information Commissioners Office (ICO) under **registration number End To End Total Loss Vehicle Management Limited – ZA528445.**



### 3. What does the law say?

3.1 A privacy policy is a legal agreement that explains what kinds of personal information is gathered from website visitors, how you use this information, and how it is kept safe. Under the General Data Protection Regulation where personal data is collected, it is important to inform clients and customers how their data is being used and stored. European General Data Protection Regulation (GDPR) and Data Protection Act 2018 (UK)

### 4. Requirements of employees and the Company

4.1 In this notice:

4.1.1 **Personal data** means any data which can identify you directly or indirectly, (whether on its own or when combined with other data), regardless of the format or media on which the data is stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does NOT include data that has been manipulated so that you can no longer be identified from it (anonymous data).

4.1.2 **Processing** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

4.2 Why do we process personal data about you?

4.2.1 As a supplier to clients who instruct us to carry out services in the collection, storage and disposal of motor vehicle salvage we collect personal data about you, in order to:

- Provide the Services under the instruction of the client on behalf of you, their customer, in respect of a claim.
- To assist a client in the handling of claims made against an insurance policy.
- To resolve any complaints, you may have in relation to the service we provide.
- For management information, business information and auditing purposes.

4.3 What personal data do we process about you?

- The personal data we process about you is minimal and poses a minimal impact to your individual freedom and rights.
- The data we process is information that an individual would reasonably expect such a supplier to process in order to fulfil the service requirements of the client.
- We process:
  - Your name
  - Your home or work address
  - Your contact numbers and email address
  - The make & model of your motor vehicle
  - The vehicle registration of your motor vehicle
  - Your policy claim reference
  - Images of your vehicle for inspection purposes



#### 4.4 Who do we collect your personal data from?

##### 4.4.1 We collect personal data about you from:

- A motor vehicle insurer
- Any client instructing e2e to carry our services in relation to the collection, storage and disposal of motor vehicle salvage
- A motor vehicle insurer representative; (holding garage)
- Independent motor vehicle engineers

#### 4.5 What is the nature of processing your personal data?

##### 4.5.1 The nature of processing is to:

- Access & review personal data.
- Hold/store personal data.
- Produce estimates, vehicle images, invoices.
- Produce management information all for the purposes of carrying out the required services.

#### 4.6 What is the lawful basis for processing your personal data?

##### 4.6.1 Our lawful basis for processing your personal data is:

- Due to the entering into and performance of a business contractual agreement with a motor vehicle insurer.
- Art 6(f) legitimate interest based on the need to be able to provide information, when required by the Data Controller, in relation to a claim made by a motor vehicle customer in relation to the collection, inspection and disposal of a motor vehicle.
- Art 6(f) legitimate interest to monitor our business performance, audit our business processes, and improve the service we provide to our clients.
- To enable us to adhere to the Limitation Act 1980 in respect of any claim made by you against your contract with the motor vehicle insurer, of whom we are a supplier of services.

#### 4.7 Who do we share your personal data with?

4.7.1 e2e is the head office of a network of salvage dismantler and recycling companies located across the UK. These companies are sub-contractors of e2e working as part of the supply chain to the client.

##### 4.7.2 We share your personal data with them in order for them to:

- Arrange the collection & disposal of your motor vehicle following a claim to client.
- Produce vehicle images to assist in the inspection and/or valuation of your motor vehicle.

4.7.3 Where e2e uses sub-contractors to process personal data (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to personal data.

#### 4.8 Where do we store your personal data?



4.8.1 Some of your personal data may be held in hard copy files stored in secure locations. Most personal data about you, including a copy of your personnel file will be stored on servers within the UK. The company does not transfer any data outside of the European Economic Area (EEA).

#### 4.9 How do we keep your personal data secure?

4.9.1 The company has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the company limits access to your personal data to the persons and organisations, including those described above, who have a lawful and legitimate need to access it.

4.9.2 e2e have also put in place procedures to deal with any suspected personal data security breach and will notify the Data Controller of a suspected breach where legally required to do so.

#### 4.10 How long will we keep your personal data?

4.10.1 We will not keep your personal data for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose.

4.10.2 We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, or prevent fraud.

4.10.3 We will retain all minimal personal information as outlined earlier in this policy for a period of 6 years from the date of record completion to e2e.

4.10.4 The company sub-contractors will retain your personal data for a period of 3 years from the date of record completion to 'the company', thereafter the record will be permanently deleted.

4.10.5 This is in order for us, and our sub-contractors, to:

- Fulfil the contractual requirements we have with clients.
- Assist a client in any claims made against a motor policy.
- To monitor business performance.

#### 4.11 What are your rights in relation to your personal data?

4.11.1 You have a number of rights in relation to the processing of your personal data by 'the company':

- **Informed:** You have the right to be kept informed about who we share your personal data with.
- **Access:** You have the right to request access to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that 'the company' is processing it lawfully and fairly.
- **Rectification:** You have the right to request rectification of any inaccurate or incomplete personal data held about you.



- **Erasure/To be forgotten:** You have the right to request erasure of any personal data held about you where there is no good reason for ‘the company’ to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restrict processing:** You have the right to request restriction of how ‘the company’ processes your personal data; for example, you may have issues with the content of the information you hold or how we have processed your data. This is an alternative to requesting its erasure.
- **Data Portability:** You have the right to request copies of your personal data in a structured, commonly used and machine-readable format. It also gives you the right to request that a controller transmits this data directly to another controller.
- **Object:** You have the right to object to e2es processing of any personal data which is based on the legitimate interests of the company or those of a third party based on your particular circumstances. You also have the right to object to e2e processing your personal data for direct marketing purposes.
- **Automated Decision Making & Profiling:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- Please note that these rights may be limited by the legislation and we may be entitled to refuse requests where exceptions apply.
- You can find out more about your rights from the Information Commissioner’s Office: [www.ico.org.uk](http://www.ico.org.uk) for an independent review.

## 5. Further Information

5.1 e2e will ensure any amendments are made and any changes in regulations are adhered to by all employees within e2e Total Loss Vehicle Management.

5.2 It is the responsibility of the Change & Compliance Manager to review this policy every 12 months.

5.3 e2e may update this notice at any time. You should check this notice regularly to take notice of any changes, however where any changes affect your rights and interests, we will make sure we bring to this your attention and clearly explain what this means to you.

## 6. Further Reading

- QSP-005 Data Protection Policy



## 7. Version Control

Reviewed and approved in July 2023.



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## APPENDIX 1 FURTHER INFORMATION

### How to contact us

**Complaints:** You have the right to complain to the Information Commissioner's Office (ICO) in relation to how the company processes your personal data.

To exercise any of these rights you must contact your motor vehicle insurer, or you can contact the Compliance department directly at [compliance@e2etotalloss.com](mailto:compliance@e2etotalloss.com)

As data processors of your personal data we are legally bound to refer all communication in relation to data breaches, data subject access requests, and data subject rights to the Data Controller, who for the purposes of this policy, is the motor vehicle insurer or any client instructing e2e to carry out services in relation to the collection, storage and disposal of motor vehicle salvage

The company may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

If you want to request information about our privacy notice or exercise any of your data protection rights, please contact us at:

Compliance Team  
e2e Total Loss Vehicle Management  
Unity House  
Dudley Road  
Darlington  
Co Durham  
DL1 4GG

+44 01325 352626  
(Calls are recorded for security and training purposes)

[compliance@e2etotalloss.com](mailto:compliance@e2etotalloss.com)

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