

Complexus Limited – Privacy Policy

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1 Introduction

We at Complexus Limited (referred to in this Privacy Policy as “we/us/our”) understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of our clients, prospective clients and everyone else who visits our website(s) (complexus.uk, location-services.complexus.uk, critical-communications.complexus.uk, tracking.complexus.uk) and we will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

In this Privacy Policy the websites:

- location-services.complexus.uk and critical-communications.complexus.uk are referred to as “Websites”
- complexus.uk and tracking.complexus.uk are referred to as “Portals”

2 What Does This Notice Cover?

This Privacy Policy explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3 What is Personal Data?

3.1

UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) “any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”.

3.2

In simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

3.3

The personal data that we use is set out in clause 6.

4 What Are My Rights?

4.1

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

4.1.1

The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in clause 13.

4.1.2

The right to access the personal data we hold about you. Clause 11 will tell you how to do this.

4.1.3

The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in clause 13 to find out more.

4.1.4

The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in clause 13 to find out more.

4.1.5

The right to restrict (i.e. prevent) the processing of your personal data.

4.1.6

The right to object to us using your personal data for a particular purpose or purposes.

4.1.7

The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

4.1.8

The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

4.1.9

Rights relating to automated decision-making and profiling. Clause 7 explains more about how we use your personal data, although we do not carry out automated decision-making or profiling.

4.2

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in clause 13.

4.3

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed for as long as we have that data.

4.4

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

4.5

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in clause 13.

5 Who Is Responsible for My Personal Data?

We are the data controller, and we are responsible for your personal data.

6 What Personal Data Do You Collect and How?

6.1

We may collect and hold some or all the personal data set out below. We do not collect any "special category" or "sensitive" personal data such as credit card details, or data relating to criminal convictions and/or offences.

6.2

We do not knowingly collect information on children. If we have collected personal information on a child, please contact us immediately using the details in clause 13, so we can remove this information without any undue delay.

6.3 Websites

Most of the personal information we process is provided to us by you for one of the following reasons:

Direct Interactions	<p>You may provide us with your Identity/Contact data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:</p> <ul style="list-style-type: none"> • contact us about our services • subscribe to our newsletter • request marketing information to be sent to you • apply for employment or provide us with services
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	<ul style="list-style-type: none"> • provide us with feedback.
Automated technologies or interactions	As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. Further information about our use of cookies can be found in clause 12.
Third parties or publicly available sources	<p>We may receive personal data about you from various third parties, including technical data from the following parties:</p> <ul style="list-style-type: none"> • analytics providers • advertising networks • search information providers such as Google some of which may be based outside of the UK.

6.3.1

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Data Collected
“Identity” Information including first name, last name, and title.
“Contact” Information including personal addresses, company addresses, email addresses and telephone numbers.
“Financial” Information including bank account and payment details.
“Transaction” Information including details about payments to and from you, and other details of services you have purchased from us.
“Technical” Information including internet protocol (IP) address, browser type and version and time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
“Profile” Information including your interests, preferences, feedback and survey responses.
“Usage” Information including information about how you use our website and our services.
“Marketing and Communications” Information including your preferences in receiving marketing from us and our third parties, and your communication preferences.

6.3.2

We use online advertising to keep you aware of what we’re up to and to help you find information about our services. We may target banners and ads to you when you use other websites and apps, based on your Contact, Technical, Usage and Profile Data. We do this using a variety of digital marketing networks and ad exchanges, and a range of advertising technologies such as web beacons, pixels, ad tags, cookies, and mobile identifiers, as well as specific services offered by some sites and social networks.

6.4 Portals

6.4.1

As you use our tracking services the data generated is collected and processed by us which we then send to your user account for you to use.

6.4.2

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Data Collected
“Tracking” Information including longitudes, latitudes and addresses.
“Vehicle” Information including CAN data, DTC fault codes and telemetry.
“Identity” Information including first name, last name, and title.
“Contact” Information including personal addresses, company addresses, email addresses and telephone numbers.

7 How Do You Use My Personal Data?

7.1 Websites

7.1.1

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis	Why do we process your personal data in this way?
To handle enquiries and to interact with clients and prospective clients	<ul style="list-style-type: none"> Identity Contact Marketing and Communications 	<ul style="list-style-type: none"> Necessary for our legitimate interests 	<ul style="list-style-type: none"> To develop our business and to inform our marketing strategy
To provide our services to you including managing payments, fees and charges and collecting/recovering money owed to us.	<ul style="list-style-type: none"> Identity Contact Financial Transaction Marketing and Communications 	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests 	<ul style="list-style-type: none"> To provide our services to you under the contract To recover any debts due to us.
To manage our relationship with you which will include: <ul style="list-style-type: none"> Notifying you about changes to our terms or privacy policy 	<ul style="list-style-type: none"> Identity Contact Profile Marketing and Communications 	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests 	<ul style="list-style-type: none"> To keep our records updated To study how clients use our services.

<ul style="list-style-type: none"> Asking you to leave a review or take a survey 			
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> Identity Contact Technical 	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests 	<ul style="list-style-type: none"> To run our business To ensure network security To prevent fraud For any business reorganisation or group restructuring exercise
To use data analytics to improve our website, services, marketing, client relationships and experiences	<ul style="list-style-type: none"> Technical Usage 	<ul style="list-style-type: none"> Necessary for our legitimate interests 	<ul style="list-style-type: none"> To define types of clients for our products and services To keep our website updated and relevant To develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about services that may be of interest to you	<ul style="list-style-type: none"> Identity Contact Technical Usage Profile 	<ul style="list-style-type: none"> Necessary for our legitimate interests 	<ul style="list-style-type: none"> To develop our services and grow our business

7.1.2

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and/or post with information, news and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

7.2 Portals

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis	Why do we process your personal data in this way?
To provide our location tracking service to you.	<ul style="list-style-type: none"> Tracking Vehicle Identity Contact 	<ul style="list-style-type: none"> Performance of a contract with you 	<ul style="list-style-type: none"> To provide our location tracking service to you under the contract

Support	<ul style="list-style-type: none"> • Tracking • Vehicle • Identity • Contact 	<ul style="list-style-type: none"> • Performance of a contract with you 	<ul style="list-style-type: none"> • To help you with any issues you may have
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7.3

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish for us to explain how the new purpose is compatible with the original, please contact us using the details in clause 13.

7.4

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

7.5

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8 How Long Will You Keep My Personal Data?

8.1

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

8.2

Data from the Portals are kept for 2 years, to allow the user to use the historical playback and reporting features.

8.3

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 are available in our retention policy which you can request from us using the contact details outlined in clause 13.

9 How and Where Do You Store or Transfer My Personal Data?

9.1

The majority of your personal data will be stored in the UK. However, we may store some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

9.2

We may store some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

9.2.1

We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data. For further information, please refer to the Information Commissioner’s Office.

9.2.2

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner’s Office.

9.2.3

We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the Information Commissioner’s Office.

9.2.4

Please contact us using the details below in clause 13 for further information about the particular data protection safeguard(s) used by us when transferring your personal data to a third country.

9.3

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

9.3.1

Limiting access to your personal data to those employees, agents, sub-contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality.

9.3.2

Procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so.

10 Do You Share My Personal Data?

10.1

We may sometimes contract with other third parties to supply services to you on our behalf, such as sub-contractors, and in some cases, these third parties may require access to some or all your data to provide services to you. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

10.2

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a new owner, but Complexus Limited will not share any data. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

10.3

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10.4

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in clause 9.

11 How Can I Access My Personal Data?

11.1

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

11.2

All subject access requests should be made in writing and sent to the email or postal address shown in clause 13.

11.3

There is not normally any charge for a subject access request. If your request is "manifestly unfounded or excessive" (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

11.4

We will respond to your subject access request within 5 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12 Our Use of Cookies

12.1

All Cookies used by and on our website are used in accordance with current cookie law.

12.2

We may place and access first party and third-party cookies on your computer or device, to facilitate and improve your experience of our website and to provide and improve our services.

12.3

First party cookies are those placed directly by us and are used only by us. Third party cookies are those placed by websites, services, and/or parties other than us. These cookies are not integral to the functioning of our website and your use and experience of our website will not be impaired by refusing consent to them.

12.4

Before cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those cookies. By giving your consent to the placing of cookies, you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of cookies; however certain features of our website may not function fully or as intended.

12.5

You can view the list of cookies our website uses, by clicking on the padlock icon in the search bar. You can also block and remove certain cookies in this way. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept cookies, but this can be changed.

12.6

Certain features of our website depend on cookies to function. Cookie law deems these cookies to be “strictly necessary”. Your consent will not be sought to place these cookies, but it is still important that you are aware of them. You may still block these cookies by changing your internet browser’s settings, but please be aware that our website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

12.7

Our website uses Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our website is used. This, in turn, enables us to improve our website and the services offered through it. You do not have to allow us to use these cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our website, it does enable us to continually improve our website, making it a better and more useful experience for you. Google’s privacy policy is available at: www.google.com/policies/privacy

12.8

You can choose to delete cookies on your computer or device at any time, however you may lose any information that enables you to access our website more quickly and efficiently.

12.9

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

13 How Do I Contact You?

13.1

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

13.1.1

Email Address: info@complexus.uk

13.1.2

Telephone number: +44 24 7697 5205

13.1.3

Postal Address: Complexus Limited, Elliot Park Innovation Centre, 4 Barling Way, Nuneaton, Warwickshire, United Kingdom, CV10 7RH.

14 Changes To This Privacy Policy

14.1

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

14.2

Any changes will be made available on our website. This Privacy Policy was last updated in December 2024.