



# Privacy Policy Statement for Lightfoot

When you use our technology, website, app, portal, or services we may collect personal information about you. We are committed to ensuring your privacy and have put together this Privacy Policy, so you know:

- What personal information we collect about you
- How we collect your personal information
- How we use your information
- Who we may share your information with
- Any transfer of personal information outside of the European Economic Area (EEA)
- How long we keep your personal information.
- What we do to protect your personal information
- What choices you have about what we can do with your information

## Who are we?

We can be contacted in writing at the address below or on email at [info@lightfoot.co.uk](mailto:info@lightfoot.co.uk) if you have any comments about this Privacy Policy.

We last updated this Privacy Policy on the 29<sup>th</sup> May 2024.

Ashwoods Lightfoot Limited owns and operates this website. We are a company registered in England and Wales under company number 08287918. Our registered address is Winslade Park, Manor Drive, Clyst St Mary, Exeter, EX5 1FY.

## What Personal information do we collect about you?

We may collect certain information about you when you use websites within the lightfoot.co.uk domain, our mobile apps, the Lightfoot Portal or one of our Lightfoot devices. The type of information we collect will be:

- Your name, address, email address, phone number and other contact details;
- Information about your social media accounts such as your username;
- Information about your computer or other device (such as its IP address) and the pages that you visited (see below for more details);
- Your PayPal details in order for you to collect prizes that are of monetary value;
- Your vehicle information;
- Information about your employment and employer (for our fleet customers);
- Your photograph (profile picture or a photo we may take if you win one of our competitions);
- Information that the Lightfoot device collects automatically about your driving and your location.

We collect information about you in two dissimilar categories:

- Identifiable information – this is information that allows us to identify you, such as name and email address, telephone number etc.
- Anonymous information – we may collect information that does not personally identify you but categorises you into a group or sector (e.g., age, marital status, lifestyle) and we can use this information to tailor our products and services more accurately.

### When you use the website or the Lightfoot Portal

We may collect personal information from you when you:

- Give us your contact details, receive further information from us or our newsletter
- Use our "Contact Us" form to leave us questions, queries, or feedback.
- Contact us via our "Support" or "Info" email addresses.
- Sign up to a personal Lightfoot account and fill in the online form.
- Contact us using your Facebook, Twitter, or Instagram accounts.
- We may also collect information about your usage of the Lightfoot app, such as the number of times you log in, which pages you visit, and which services you use.

### When using Lightfoot

Information you give us directly:

- When you create your Lightfoot account or register your Lightfoot device, by completing application forms on paper or the portal or in another format such as, over the telephone. The information may include your name, address, e-mail address and phone number, emergency contact details, vehicle make, model and registration number, and other information referred to on the application form.

Information provided by your Lightfoot

- When you install a Lightfoot device it includes technology to record information about how, where and when the vehicle is being driven. We collect this information and aggregate it with other information collected by us. Examples of the type of information We collect from the Lightfoot unit include data relating to driving efficiency, vehicle journeys (time, distance), inertial information, and diagnostic fault codes. We may request your vehicle identification number so that we can provide you with more precise feedback based on your specific vehicle. We collect information on the location of your vehicle, including your trip route, the fuel used and the parked location of your vehicle. Parked vehicle location information enables the service that helps you to find your parked vehicle. The hardware uses technologies such as GPS, Wi-Fi, and/or cell tower triangulation to record its location. Where you are using a driver ID keypad, it is your responsibility to maintain confidentiality of your unique code as that is the link between you and the information being collected.

This allows us to:

- provide a real time analysis of your driving as well as a more detailed analysis of your driving performance;
- provide you with the Lightfoot Services – listed in the Lightfoot terms supplied to you or your employer;
- check your details if they appear to be incorrect;
- analyse and compare, anonymously, your data and that of other Lightfoot users to generate anonymised statistical information about users and patterns for the purpose of enhancing the Lightfoot experience and product for users;
- provide you with rewards and offers that meet your profile and your use of your current vehicle; and
- offer competitions, enabling you to compete in leagues with other drivers and have the opportunity to win prizes.

Option	Information visible to the fleet
Show all	All information (Locations, speeds, journey times, journey distances, driver behaviour, DTCs, vehicle health)
No location information	Tracking disabled
No driver behaviour information	Driver behaviour metrics disabled (hides: G/A/R, penalties, score, harsh events)
No journey	Journeys completely removed

## Information our Website and the Lightfoot Portal collect automatically

When you visit our website or use our services, we may collect certain information automatically such as:

- the number of times you log in
- which pages you visit
- which services you use
- your IP address, and details of which version of web browser you used
- information on how you use the site, using cookies and page tagging techniques which include those from Hot Jar for our portal, Google analytics for our website, HubSpot for our emails and Facebook.

If you want more information about how we use cookies, you can find out more by reading our [Cookies Statement](#).

## Information we collect from other sources

### Fleet Drivers Only

We may receive information from your employer, so that we can provide you with your Lightfoot Device and also allow you to sign up to our app, the Portal, and our associated services.

### Other Organisations

We work with a number of other organisations such as payment processing companies, internet search engines, rewards partners, marketing organisations and cookie providers who may provide us with information about you.

These organisations include:

- Atlassian – [www.atlassian.com](http://www.atlassian.com) (Project management)
- Facebook – [www.facebook.com](http://www.facebook.com) (they only collect information where you agree via a pop up with them – if you do agree they may provide you with marketing)
- GitHub – [www.github.com](http://www.github.com) (Engineering support management)
- Google – [www.google.com](http://www.google.com) (analytics on our website usage)
- Here – [www.here.com](http://www.here.com) (Road mapping)
- HubSpot - [www.hubspot.com](http://www.hubspot.com) (Provides email marketing service and user journey tracking on website)
- Kumulos – [www.kumulos.com](http://www.kumulos.com) (Mobile Messaging)

- MPL – [www.mplcontact.com](http://www.mplcontact.com) (Customer Service)
- PayPal – [www.paypal.com](http://www.paypal.com) (Processes payments for lottery winners)
- Salesforce - [www.salesforce.com](http://www.salesforce.com) (CRM software, Communications and Customer support)
- SendGrid – [www.sendgrid.com](http://www.sendgrid.com) (Service that allows us to deliver emails to all users – managers or drivers)
- Sparkpost - [www.sparkpost.com](http://www.sparkpost.com) (email communication of reports to fleet customers)
- Stripe – [www.stripe.com/gb](http://www.stripe.com/gb) (payment collection)

## How we use your Personal Information

### Our legal basis for using your information

The law only allows us to use your personal information in certain limited circumstances:

We will most commonly process your personal information in the following situations:

- Where we need to perform a contract, we have entered into with you (e.g., to provide you with a Lightfoot device and the accompanying services)
- Where you have consented (e.g., you have signed up for a personal account and given us your consent)
- Where it is necessary for our legitimate interests, and we have considered your rights and freedoms and have concluded that our processing does not adversely affect these (e.g., where we would like to send you marketing about similar products to those which you have purchased from us or have expressed an interest in)
- Where we need to comply with a legal obligation (e.g., to comply with tax laws).

### What does this mean in practice?

We may use your information to:

- Provide you with your Lightfoot device and its associated services
- Fulfil any contracts we have entered into with you or your employer
- Provide information about driving behaviour to your employer if your Lightfoot device and/or subscription was supplied through your employer
- Provide third party services that you requested from us or are included in the Lightfoot Services
- Provide you, or (with your consent) permit third parties to provide you, with offers of goods or services relevant to your driving. Normally offers will relate to breakdown assistance services, vehicle insurance, trade in offers, and new vehicle finance offers and will be tailored based on the information we hold. Occasionally we, or such selected third parties may also contact you with such offers by email, SMS/MMS message, phone, social media. You will only receive such offers if you agree and can unsubscribe at any point
- If you agree, to enter you into competitions to win prizes
- Analyse our services and tailor them to future needs
- Prevent and detect fraud
- Administer our website (such as troubleshooting, data analysis and research)
- Help us implement measures to keep our website safe and secure.

## Our Marketing

We will send you our newsletter and other offers if you sign up for account via the web portal or Lightfoot app. Or you have signed up for receiving such offers as our Newsletter on our website.

If you are a registered user of the Lightfoot device, we may send you information with our special offers and will offer you the chance to sign up to receiving offers from third parties about related products (such as car insurance and breakdown cover).

We may use your information for market research and analysis so that we can ensure that we tailor our services to the requirements of our users.

Depending on what contact information you have given to us, we may contact you by email, SMS/MMS message, or social media.

We will only do this where you have consented to receiving such information from us. You can opt out of such marketing at any time via the app or web portal account settings or by email to us at [info@lightfoot.co.uk](mailto:info@lightfoot.co.uk).

## Sharing your data

### Employer or another Lightfoot bill payer

If you are a driver where your Lightfoot is provided by a third party such as an employer, we will share information about you with the third party per their agreement. The type of information will depend on the services that your employer subscribes to, and you will be informed of what information is shared by your employer. Your employer is the data controller for this information and further information about how they use your information can be obtained from them.

Of the information you provide us with to create a Lightfoot account in order to enter competitions and win prizes; we may share your details - including name, photo, and total winnings - with your employer upon their request.

### Other third parties

We have explained above that we may share your personal data with third parties in order to provide the Lightfoot services. If you wish to take advantage of our offers with third parties, then you will be asked for your consent before we transfer you to any other organisation's website.

We may also share your information with:

- Our business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them, or you
- Our website providers who need to see your information in order to keep our website functioning.
- Analytics and search engine providers who analyse information about your use of our website and help us to tailor the product and offers that we offer to you and other users.

We work with the following organisations:

- Amazon Web Services ([aws.amazon.com](https://aws.amazon.com)), our cloud services partner which securely stores information from our Lightfoot devices.
- Google Maps ([maps.google.co.uk](https://maps.google.co.uk)), our mapping provider.
- Kumulos ([www.kumulos.com](https://www.kumulos.com)) who provides mobile messaging.
- MPL ([www.mplcontact.com](https://www.mplcontact.com)) who provides customer support services.
- Salesforce ([www.salesforce.com](https://www.salesforce.com)), our CRM system which manages weekly newsletters with our customers. It also provides analytics as to how you interact with us.

- Stripe ([www.stripe.com](http://www.stripe.com)), our payment processor.
- Trustpilot – [uk.trustpilot.com](http://uk.trustpilot.com) (Provide invitations to users for the purpose of leaving a Trustpilot review about Lightfoot.)
- Wireless Logic Ltd ([www.wirelesslogic.com](http://www.wirelesslogic.com)), IoT/M2M connectivity platform provider.

## Legal Requirements and Law Enforcement

- We sell our business in which case the personal information that we hold will be part of the transferred assets
- We are required by law, or in order to enforce or apply our terms of use. This includes exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

## Third Party Privacy Policies

This Privacy Policy applies only to Lightfoot systems, and not to websites or content owned by third parties. We may provide links to other websites and content, and we suggest that you check the policies of these sites before giving them your personal information as we cannot accept responsibility.

## Keeping your Personal Information

### Where we store your Personal Information

We are committed to ensuring that both we and our suppliers have appropriate technical, administrative, and physical procedures in place to ensure that your information is protected against loss or misuse.

We require all our suppliers who manage your personal information to have appropriate technical, administrative, and physical procedures in place to ensure that your information is protected against loss or misuse. We work closely with our suppliers to make sure that this requirement is met.

If a supplier is outside of the EEA, we will ensure that they have entered into a data transfer agreement that is consistent with the requirements of applicable law and that gives the individuals enforceable rights and effective legal remedies and provides adequate levels of protection in relation to any Personal Data that is transferred.

Any card payment transactions enacted by or on behalf of Lightfoot will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential.

### Emails

We have procedures and security features in place to try and keep your data secure once we receive it. If you choose to send us information via email, we cannot guarantee the security of this information until it is delivered to us.

## Retention of Information

We only hold your personal information for as long as necessary for the purposes for which we collected your information.

We outline below how long we retain information for and how it is deleted:

Description of data	Retention Period	Reason for Retention Period	Method of Disposal
Contact details	Statutory or 1 year after contract end.	Contract fulfilment	Delete or anonymise data.
Demographic details	1 year after contract end.	Provision of Lightfoot services + deletion time	Delete or anonymise data.
Payment details	Contract end		Delete or anonymise data files.
Transaction history	Statutory limits	Statutory requirement	Delete or anonymise data files.
Vehicle information	1 year after contract end.	Provision of Lightfoot services + deletion time	Delete or anonymise data files.
Employment information	6 years after contract end.	Provision of Lightfoot services + deletion time	Delete or anonymise data files.
Photographs	1 year after contract end for product system. As agreed with the subject for any marketing.	Provision of Lightfoot services + deletion time. Promotion of goods and services.	Delete data files.
Driver behaviour	1 year after contract end.	Provision of Lightfoot services + deletion time	Delete or anonymise data files.
Location information associated with driving	1 year after contract end.	Provision of Lightfoot services + deletion time	Delete or anonymise data files.
Online browsing history and statistics	3 years	Provision of Lightfoot services + deletion time	Delete or anonymise data files.
CRM based marketing database	3 years after the last enquiry has been received or within 7 days of a request to unsubscribe.	Provision of information on Lightfoot news, product, and services	Delete from CRM system.

We have set these timescales in accordance with any applicable legislation and where none exists then we will keep your information for the duration of any contract that you have entered into with us and then for a period of 7 years after which time it will be deleted.

Where you have requested marketing information from us, then we will only keep this information for a maximum of up to 3 years. If you do not contact us further during this period, then your information will be deleted.

## Your rights

### Access to information

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold, please contact [info@lightfoot.co.uk](mailto:info@lightfoot.co.uk) or write to us at the address above.



## Changing or deleting your information

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you.

You can request that we change, amend, delete your information or restrict our processing by using the check boxes on the forms we use to collect your information, emailing us at [info@lightfoot.co.uk](mailto:info@lightfoot.co.uk), or writing to us at the address at the beginning of this Privacy Policy.

## Right to prevent automated decision making

You have a right to ask us to stop any automated decision making. If you would like to request, we stop, or you have any questions or concerns we would be happy to discuss them with you and you can contact us at [info@lightfoot.co.uk](mailto:info@lightfoot.co.uk).

## Transferring Personal Information

You have the right to request that your personal data is transferred by us to another organisation (this is called "data portability"). Please contact us at [info@lightfoot.co.uk](mailto:info@lightfoot.co.uk) with the details of what you would like us to do and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to try and find a solution.

## Complaints

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed under our internal complaints

procedure. Our internal complaints procedure allows your request to be reviewed by our ISMS team lead who will do their best to try and resolve the issue.

If you have been through the internal complaints procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner's Office. They can be contacted as follows:

Address:  
Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Website: [www.ico.org.uk](http://www.ico.org.uk)

Telephone: 0303 1231113

If you are an international resident, you may wish to complain to the relevant country's ICO.

## Changes to our Privacy Policy

The internet and data privacy best practice are both developing. We therefore reserve the right to revise this Privacy Policy at any time. If this Privacy Policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

## How to contact us

Questions, comments, and requests regarding this Privacy Policy are welcomed and should be addressed to [info@lightfoot.co.uk](mailto:info@lightfoot.co.uk).