



The Data Hub

MANAGED FLEET TECHNOLOGY SERVICES

Serving The Insurance Industry

Privacy Policy

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VERSION	DATE	REVISION AUTHOR	SUMMARY OF CHANGES
1	10/02/2025	Lewis Rutherford	
2	27/10/2025	Lee Stevens	

Privacy Policy

1. Introduction

The Data Analysis Hub Ltd understands 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 all our customers and 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.

2. Information About Us

Business Name: The Data Analysis Hub Ltd

Business Type: Limited company registered in England and Wales under company number 09276763

Registered address: 1 The Courtyard, 707 Warwick Road, Solihull, West Midlands. B91 3DA

Main trading address: 1 The Courtyard, 707 Warwick Road, Solihull, West Midlands. B91 3DA

VAT number: 197 4253 74

Compliance Director: Lewis Rutherford

Email address: l.rutherford@thedatahub.uk

Telephone number: 0121 389 4035

Postal address: 1 The Courtyard, 707 Warwick Road, Solihull, West Midlands. B91 3DA

3. What Does This Notice Cover?

This Privacy Information 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.

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4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (the “UK GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, 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.

The personal data that we use is set out in Part 6, below.

5. What Are My Rights?

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

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice 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 Part 13.
- b) The right to access the personal data we hold about you. Part 12 will tell you how to do this.
- c) 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 Part 13 to find out more.
- d) 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 Part 13 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.

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- g) 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.
- h) 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.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

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 Part 13.

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 as long as we have that data.

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

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 however welcome the opportunity to resolve your concerns ourselves, so please contact us, using the details in Part 13.

6. What Personal Data Do We Collect and How?

Depending upon your use of our service, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data. The Data Hub monitors and processes data from devices, in the process of collecting device data varying types of personal data will also be captured. You, as the customer, decide whether a device is associated with a specific person and decide which data is collected from each device.

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We may collect personal data:

- **Directly from you when you:** interact with us, contact us, fill out forms, and purchase our products and services, request footage, incident analysis or data monitoring services and create an account to access our platform.
- **Automatically when you:** visit our website, when you use our dash cam technology and telematics products installed in your vehicles, interact with our AI-powered incident detection systems, access our data analysis and monitoring platforms and interact with our website and engage our platforms.
- **Indirectly when you:** provide us with incident details or footage as requested by us, complete our request for footage or incident reporting forms, are captured on dash cam footage from vehicles using our products (such as other road users, pedestrians, or third-party drivers involved in incidents).
- **From third parties including:** insurance companies who share claim details with us for incident analysis and fleet operators or employers/employees who provide us with driver and vehicle information.

Data Collected	How We Collect the Data
Vehicle make, model and registration number	<p>Directly from you at the outset, when you request footage from us, during performance of the contract or automatically when you use our dash cam technology and telematics products installed in your vehicles, interact with our AI-powered incident detection systems, access our data analysis and monitoring platforms and interact with our website and engage our platforms.</p> <p>From third parties including: insurance companies, fleet operators and employers/employees.</p>
Interior of vehicle which may include driver’s face, facial expressions, and activity within the vehicle.	<p>From video footage (automatically when you use our dash cam technology and telematics products installed in your vehicles, interact with our AI-powered incident detection systems, access our data analysis and monitoring platforms and interact with our website and engage our platforms OR Indirectly when you are captured on dash cam footage from vehicles using our products (such as other road users, pedestrians, or third-party drivers involved in incidents)</p>

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<p>Interior of vehicle which may include passenger's face, facial expressions and activity within the vehicle.</p>	<p>From video footage (automatically when you use our dash cam technology and telematics products installed in your vehicles, interact with our AI-powered incident detection systems, access our data analysis and monitoring platforms and interact with our website and engage our platforms OR Indirectly when you are captured on dash cam footage from vehicles using our products (such as other road users, pedestrians, or third-party drivers involved in incidents)</p>
<p>Exterior surroundings of the vehicle which may include footage of third parties such as pedestrians, cyclists and other road users.</p>	<p>From video footage (automatically when you use our dash cam technology and telematics products installed in your vehicles, interact with our AI-powered incident detection systems, access our data analysis and monitoring platforms and interact with our website and engage our platforms OR Indirectly when you are captured on dash cam footage from vehicles using our products (such as other road users, pedestrians, or third-party drivers involved in incidents)</p>
<p>Detailed location information in the form of a time stamped GPS signal, which will indicate the location of a vehicle and occupants.</p>	<p>From video footage and telemetry data (automatically when you use our dash cam technology and telematics products installed in your vehicles, interact with our AI-powered incident detection systems, access our data analysis and monitoring platforms and interact with our website and engage our platforms OR Indirectly when you are captured on dash cam footage from vehicles using our products (such as other road users, pedestrians, or third-party drivers involved in incidents)</p>
<p>Any personal data shared in video footage by a driver or passenger, e.g. a name tag or personalised clothing.</p>	<p>From video footage (automatically when you use our dash cam technology and telematics products installed in your vehicles, interact with our AI-powered incident detection systems, access our data analysis and monitoring platforms and interact with our website and engage our platforms OR Indirectly when you are captured on dash cam footage from vehicles using our products (such as other road users, pedestrians, or third-party drivers involved in incidents)</p>

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<p>Contact information including name, address, email address and telephone number.</p>	<p>Directly from you at the outset and during performance of the contract</p> <p>From third parties including: insurance companies, fleet operators and employers/employees.</p>
<p>Payment information including bank details.</p>	<p>Directly from you at the outset and during performance of the contract</p>
<p>Service-related information, to include:</p> <ul style="list-style-type: none"> • Transaction details for products and services you've purchased from us or enquiries about our products and services • Your preferences for our services • Feedback, complaints and compliments and survey responses • Any claims or incidents. 	<p>Directly from you when you: interact with us, contact us, fill out forms, and purchase our products and services, request footage, incident analysis or data monitoring services and create an account to access our platform.</p> <p>From third parties including: insurance companies, fleet operators and employers/employees.</p>
<p>Digital information, to include:</p> <ul style="list-style-type: none"> • IP address and general location information derived from your IP address • Search and browsing behaviour and user journeys • Website usage patterns • Cookie preferences and tracking 	<p>Automatically when you use our dash cam technology and telematics products installed in your vehicles, interact with our AI-powered incident detection systems, access our data analysis and monitoring platforms and interact with our website and engage our platforms</p>
<p>Professional information (for job applicants and workers), to include:</p> <ul style="list-style-type: none"> • Employment history • Professional experience • Required authorisations and licences • Professional registrations • Information about your right to work in the UK 	<p>Directly from you when you apply to work with us.</p>

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7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data.

We can only use your information when we have one or more of these legal bases.

- **Consent** - You have clearly agreed to us using your personal data for a specific purpose.
- **Performance of a contract** - We need to use your information to fulfil a contract with you, or because you've asked us to do something before entering into a contract.
- **Legal duty** - We must use your information to comply with the law.
- **Vital interests** - We need to use your information to protect someone's life.
- **Public interest** - We need to use your information to perform a task in the public interest or carry out official functions that have a clear legal basis.
- **Legitimate interests** - We have a genuine business reason to use your information, or a third party does, but only if this doesn't unfairly override your rights and interests. Where we rely on legitimate interests as our legal basis, we have conducted balancing tests to ensure our interests do not override your fundamental rights and freedoms. These assessments consider:
 - the nature of our legitimate interest;
 - the impact on you;
 - any safeguards we can implement;
 - your reasonable expectations; and
 - the broader context of our relationship.

Note that we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data. We have listed the reasons we process your data and the legal basis below. Please reach out to us if you need further details about the specific legal basis we are relying on to process your personal data.

The following table describes how we may use your personal data, and our lawful basis for doing so:

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What We Do (Purpose)	What Data We Use	Our Lawful Basis
Review video footage supplied from cameras in your vehicle(s)	Vehicle make, model and registration number. Vehicle location data and other telematic data. Driver facial image and express and activity within a vehicle.	Performance of a contract, legal duty and legitimate interests.
Forward footage direct to your insurance company.	Vehicle make, model and registration number. Driver name and telephone number where applicable. Vehicle location data and other telematic data. Driver facial image and expression and activity within a vehicle.	Performance of a contract, legal duty and legitimate interests.
Installation of our products	Contact information including name, address, email address and telephone number	Performance of a contract.

In addition to the above, we may also process your personal data for the reasons stated below.

Managing your account and providing our services

What we use your information for:

- To enable you to access and use our platform and services, including providing login credentials.
- To provide our services (to include our monitoring service) to you, including dispatch, delivery and installation of our products.
- To contact and communicate with you about our services, including responding to support requests and enquiries and for dealing with complaints or claims.
- Internal record keeping, administrative, invoicing and billing purposes.

Legal basis for using this information:

- Performance of a Contract

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- Legal Duty (for billing and record-keeping requirements)
- Legitimate interests

Types of information we use:

- Identity and contact details
- Service-related information
- Financial Information
- Digital information

Website enquiries and customer service

What we use your information for:

- To contact and communicate with you about any enquiries you make with us via our website.

Legal basis for using this information:

- Legitimate interests

Types of information we use:

- Identity and Contact Data
- Digital Information

Business improvement and development

What we use your information for:

- Market research and business development
- To operate and improve our services

Legal basis for using this information:

- Legitimate interests

Types of information we use:

- Digital Information

Recruitment and employment purposes

What we use your information for:

- To consider your application if you have applied to work with us and to keep you up to date with its progress
 - In relation to self-declared disabilities in order for us to make a reasonable adjustments to support your application and any possible future employment
 - In relation to any diversity or equal opportunities monitoring questionnaire data, to monitor and report on our equality and diversity composition and ensure fairness in the recruitment process
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- In relation to any right to work information we collect, in order to ensure we comply with the law in employing you
- To keep you updated on any other suitable vacancies

Legal basis for using this information:

- Legitimate interests
- Legal Duty
- Consent
- Performance of a Contract

Types of information we use:

- Identity and Contact Data
- Professional Data

Legal compliance

What we use your information for:

- Comply with our legal obligations or if otherwise required or authorised by law

Legal basis for using this information:

- Legal Duty

Types of information we use:

- All relevant Personal Data

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 and you will be able to opt-out at any time.

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 us to explain how the new purpose is compatible with the original, please contact us using the details in Part 13. If we relied upon the lawful basis of consent, we acknowledge that we cannot substitute this for another lawful basis without your consent.

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, or in any event, seek your consent.

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8. Artificial Intelligence (AI) Technologies

We use artificial intelligence and machine learning technologies in our business operations and services, including AI tools provided by third parties. We only use these technologies when legally permitted and necessary for our business.

How we use AI

We may use AI technologies to conduct analysis and data processing (rapid incident analysis using AI -powered cameras that detect driver behaviours and safety incidents).

Data protection and security

When we work with third-party AI providers, we ensure they handle your personal data in accordance with privacy laws through contractual requirements and appropriate safeguards.

Your rights and our commitments

Any information generated or inferred about you by AI technologies is treated as personal data, and you maintain all the rights outlined in this privacy policy. When using AI with your personal data, we commit to:

Transparency and control

- We will inform you when AI is used to make decisions that may significantly affect you
- We maintain human oversight and review of significant AI-generated decisions
- Our staff are trained to understand AI limitations and verify outputs before relying on them
- We implement processes to verify the accuracy of AI-generated outputs

Security

- We use appropriate technical and organisational measures to maintain the security and integrity of your personal data
- We regularly test and monitor AI outputs for accuracy and reliability

Risk mitigation

- We regularly assess and document risks associated with using AI to process personal data
- We implement appropriate measures to address these risks

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- We continuously monitor AI performance and regularly review their impact

9. How Long Will You Keep My Personal Data?

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. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long [We] OR [I] Keep It
Video footage	12 months following the termination of the contract or removal of vehicle from your fleet
Contact information including name, address, email address and telephone number.	12 months following the termination of the contract or removal of vehicle from your fleet
Payment information including payment profile and bank details.	12 months following the termination of the contract or removal of vehicle from your fleet

In addition to the above, we will also endeavour to keep your personal data for as long as we need it to:

- provide our services to you;
- meet our legal, tax, accounting or regulatory obligations; or
- handle any complaints or legal issues that may arise.

We may also keep your information for longer periods if:

- you make a complaint that we need to investigate or respond to;
- we reasonably believe legal action involving our relationship with you might occur; or
- the law requires us to keep it for specific timeframes.

How we decide retention periods

When determining how long to keep your information, we consider:

- how much information we have and how sensitive it is;
- the risk of harm if the information was accessed without permission;
- whether we can achieve our purposes in other ways;
- what legal, regulatory, tax or accounting rules require; and

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- the nature of our relationship with you and the services we provide.

What happens when we no longer need your information

Once we no longer need your personal data, we will securely delete or destroy it in accordance with our data retention policies and legal requirements.

Your Rights

You can request information about retention periods for your data and ask for early deletion where legally possible.

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

We will only store or transfer 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 Data Protection Legislation, UK GDPR, and/or to equivalent standards by law.

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:

- limiting access to your personal data to those authorised and trained employees with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- implementing 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.

Our approach to overseas transfers

When we transfer your personal data outside the United Kingdom, we ensure it receives appropriate protection by:

- Only transferring your information to countries that UK data protection law recognises as providing adequate protection for personal data, or
- Putting in place a contract with the third party that means they must protect personal data to the same standards as the UK.
- Transferring personal data to organisations that are part of specific agreements on cross-border data transfers with the UK.

What this means for you

We only transfer the minimum amount of personal data necessary and require all recipients to:

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- protect your information to the same standards required by UK law;
- use your information only for the purposes we have agreed;
- allow us to monitor how they handle your information; and
- provide you with the same rights over your information that you have under UK law.

11. Do You Share My Personal Data?

Certain data collected, which may include personal data, may from time to time be shared directly with your Insurance Company, Insurance Intermediary, Insurance Broker and/or appointed Claims Management company. The type of data we share with the above will include, but is not limited to, video footage, driving data, location, crash reconstruction and connectivity and statistics obtained from the devices installed in your vehicles. A full list will always be available from your device provider.

We will not share any of your personal data with any other third parties for any purposes, subject to the following exceptions.

- If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. 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.
- 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.

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 Part 10.

12. How Can I Access My Personal Data?

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".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the

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easiest way to tell us everything we need to know to respond to your request as quickly as possible.

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.

We will respond to your subject access request without undue delay 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.

13. How Do I Contact You?

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

Email address: l.rutherford@thedatahub.uk

Telephone number: 0121 389 4035

Postal Address: The Data Analysis Hub Ltd, 1 The Courtyard, 707 Warwick Road, Solihull, West Midlands. B91 3DA

14. Cookies and analytics

Cookies

We may use cookies and similar tracking technologies on our website and platform to enhance your browsing experience and improve our services.

What are cookies?

Cookies are small text files that are stored on your device when you visit our website. They help us remember your preferences and understand how you use our site.

Types of cookies we may use

- Essential cookies: Necessary for the website and our platform to function properly.
- Performance cookies: Help us understand how visitors interact with our website and platform.
- Functionality cookies: Remember your preferences and settings.

Cookie consent

When you first visit our website or platform, you will see a cookie notice explaining our use of

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cookies. You can choose which types of cookies to accept through our cookie preference centre. You'll find more information about the cookies we use in our cookie pop-up.

Managing your preferences

You can change your cookie preferences at any time by:

- Using our cookie preference centre on the website
- Adjusting your browser settings to refuse or delete cookies
- Visiting our cookie policy for detailed information about specific cookies

Please note that disabling certain cookies may affect the functionality of our website and your user experience.

15. Changes to this Privacy Notice

We may change this Privacy Notice 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. Any changes will be made available on our website. This Privacy Notice was last updated on 13 November 2025.

This policy has been approved and authorised by:

Name: Lewis Rutherford

Position: Compliance Director

Date: 13th November 2025