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Fuelpecker Privacy Policy

Horizon Fuel Limited (referred to as "**Fuelpecker**" or "**we**" or "**our**") is committed to respecting the privacy of individuals, including its clients. Fuelpecker is a company registered in England and Wales under number 12034098, and whose registered office is at Templeback, 10 Templeback, Bristol, United Kingdom, BS1 6FL

Fuelpecker is a dedicated service providing individual motorists with discounted fuel at all ESSO petrol stations in the United Kingdom and Europe.

Fuelpecker owns and operates this site: <https://fuelpecker.com>. Fuelpecker collects your personal data as explained below, when you access our site and you create your user account for becoming a user and then using our fuel cards.

This Privacy Policy ("**Policy**"), together with our terms and conditions [insert link] and any other documents referred to in it, sets out the basis on which Fuelpecker processes such personal data. Please read the following carefully to understand our views and practices regarding how we handle personal data.

For the purposes of applicable data protection law (in particular, the General Data Protection Regulation (EU) 2016/679 (the "**GDPR**")), the entity referred to above is the "data controller" of your personal data.

Personal Data We collect

We may collect and process the following personal data:

- **Information you give us:**
 - When you create an account on our site in order to become a user and use our fuel cards, we may process your personal data - including your name, address, e-mail address, phone number, vehicle registration number, payment method, debit card information .
- **Information we collect about you:** With regard to each of your visits to our site we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - information about your visit; products, services or issues you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the site.
- **Information we receive from other sources:**
 - We may also receive information about you when our payment service provider settles a payment on your behalf and /or from your bank in the event there is a failed payment.

- **Information about other people:** If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

General Use and Legal Basis

We use your personal data:

1. To measure the adequate performance of our contract with you, for:
 - a. Managing such contractual relationship between you and us;
 - b. Enabling you to access and use our site, and
 - c. Enabling you to use our fuel cards.
2. Where this is necessary for purposes which are in our legitimate interests. These interests are:
 - a. Facilitating the creation of, and securing, your account on our network; and
 - b. Improving the quality of experience when you interact with our services.
3. For purposes which are required by law:
 - a. Responding to requests by government or law enforcement authorities conducting an investigation.

Disclosure of Your Personal Data

We can share your personal data with our subsidiaries and/ or affiliates.

We can also share your personal data with trusted third parties including:

- Wex Europe Services (UK) Limited, for the purposes of performance of the contract we enter into with you and for the purposes of issuing the fuel card.
- Certain APIs to provide you with an improved customer journey including Messagebird and Sendgrid.
- Third party card processing and merchant acquiring companies that will process your debit card payments for us.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Debt collection companies we have appointed where you fail to make a payment to us despite several notifications to you.

We do not provide your information for marketing purposes or to marketing companies.

Moreover, we can disclose your personal data to third parties:

- If we sell or buy any business or assets, in which case we can disclose your personal data to the prospective seller or buyer of such business or assets;
- If Fuelpecker, its business, or its assets are acquired by a third party, in which case personal data held by it about its users, suppliers, or customers will be one of the transferred assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions [insert link] and other agreements; or if we reasonably consider this necessary; or to protect the rights, property, or safety of Fuelpecker, our users, our customers, or others.

Where We Store Your Personal Data and How We Protect it

We take reasonable steps to protect your personal data from loss or destruction. Where you have a username or password (or other identification information) which enables you to access certain services or parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Your Rights

You have various rights with respect to our use of your personal data:

- **Access:** You have the right to request a copy of the personal data that we hold about you. Please note that there are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal personal data about another person, or if we are legally prevented from disclosing such information. You are entitled to see the personal data held about you. If you wish to do this, please contact us using the contact details provided below.
- **Accuracy:** We aim to keep your personal data accurate, current, and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date. You can also review and correct/ update some of your personal data by logging-in to your account on our site.
- **Objecting:** In certain circumstances, you also have the right to object to processing of your personal data and to ask us to block, erase and restrict your

personal data. If you would like us to stop using your personal data, please contact us using the contact details provided below.

- **Porting:** You have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.
- **Erasure:** You have the right to erase your personal data when the personal data are no longer necessary for the purposes for which they were collected, or when, among other cases, your personal data have been unlawfully processed.
- **Complaints:** If you believe that your data protection rights may have been breached, you have the right to lodge a complaint the applicable supervisory authority or to seek a remedy through the courts.

You can exercise any of the abovementioned rights by emailing us at: customer.service@fuelpecker.com

How Long We Keep Your Personal Data

We will retain your personal data, whether or not your account is active, for as long as we believe it necessary or desirable to fulfil our business purposes or to comply with applicable law, audit requirements, regulatory requests or orders from competent courts.

Changes to our Privacy Policy

Any changes we make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

We may collect information about your computer, including your IP address, operating system and browser type, for system administration and to report aggregated information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We may collect information about your use of our website, such as pages visited, links clicked, non-sensitive text entered, and mouse movements.

Our purpose in collecting this information is to better understand how Fuelpecker's visitors use our website and to identify any usability problems, so that we may make the necessary improvements to enhance our visitors' experience in the future. When

we collect this information, your identity will remain anonymous and we do not use this information to identify you.

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

They help us to improve the Website and to deliver a better and more personalised service. They enable us:

- to estimate our audience size and usage pattern;
- to store information about your preferences, and so allow us to customise our site according to your individual interests;
- to speed up your searches; and
- to recognise you when you return to our site.

Most web browsers offer users controls, to give you the option to delete or disable cookies. You can usually find out how to do so by referring to the 'Help' option on the menu bar of your browser, or by visiting the browser developer's website. This will usually tell you how to prevent your browser from accepting new cookies; notify you when you receive new cookies; and disable cookies altogether. Please note that disabling cookies will stop you accessing private areas of the website. Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

Contact Details

Questions, comments and requests regarding this Policy are welcomed and should be addressed to customer.service@fuelpecker.com.