

Privacy Notice & Cookie Policy

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At Frasle Mobility, we take the security and privacy of your personal data seriously. This document details how we collect, use and protect the personal data you share with us.

Frasle Mobility may amend this Privacy Policy from time to time. Amended terms will be posted to www.juratek.com/privacy-notice-cookie-policy and automatically take effect on the date set out in the posted Privacy Policy, unless otherwise specified.

Scope of This Privacy Policy

This Privacy Policy applies to personal data collected through our websites as well as by telephone, by email and through related social media platforms.

Our websites and social media activity may provide links to third-party websites for your convenience and information. If you access those links, you will leave the Frasle Mobility Websites and step outside the scope of this policy. This Privacy Policy does not cover any personal data that you choose to give to unrelated third parties. We do not monitor or control the information collected by such sites or the privacy practices of any third parties, and we are not responsible for their practices or the content of their sites.

Collection of Personal Data

We may have collected your personal data directly from you at an event, a sales meeting or other business engagement. At the time, we would have been committed to being transparent about the way in which we intend to use your personal data. We will not share this with any other third-party organisation that isn't listed in this Privacy Notice.

We will use your personal data for the following reasons

- To respond to any online queries
- To communicate with you about our products and/or services
- To update our records
- To analyse any trends or profiles
- To recommend any products and/or services that we believe may be of interest to you

If you do not want to receive these promotional messages, you may opt-out when you provide us with contact information or at any time after you register by updating your preferences (see the Opt-Out section below).

In most cases, you provide us with your consent to use your personal data in accordance with this policy by providing us with that information. In some cases, we may specifically ask for your express consent if we believe that the information is either sensitive or our use of the information may include other uses not covered by this Privacy Policy or another privacy notice to which we have made available to you.

Cookies

We use cookies to improve your user experience when navigating our websites. Some cookies are required for technical reasons for our websites to operate. We refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our websites and. This data is used to deliver customised content and promotions within the Frasle Mobility Website to customers whose behaviour indicates that they are interested in a particular subject area. We use the following cookies on our websites:

- Essential website cookies
- Performance and functionality cookies
- Analytics and customisation cookies
- Social networking cookies

You have the right to decide whether to accept or reject cookies from our website. You can also set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted.

To disable cookies please follow the process below relating to your browser.

For Internet Explorer you would need to complete the following steps:

- Open Internet Explorer and select 'Tools' (cog) in the top right corner of the browser
- Scroll down and select 'Internet Options'
- Select the 'Privacy' tab
- Under settings there is a slider; drag the slider to the very top setting which will block all third-party cookies and cookies that are already on the computer cannot be read by websites

For Google Chrome you would need to complete the following steps:

- Open Chrome and select the browser menu in the top right corner of the browser (3 small dots)

- Scroll down to and select 'Settings'
- Scroll to the bottom of the page and select 'Advanced'
- Under Privacy and Security scroll down to and select 'Content Settings'
- Select 'Cookies' and scroll down to 'Block Third-Party Cookies' and click the slider; this will block third-party cookies

To find out more information about cookies and site data follow the first 4 bullet points above and then select 'see all cookies and site data'. Here you will be given a list of all the cookies and site data from any site you have visited. Scroll down until you find fraslemobility.uk and select this.

A list of locally stored data from the named cookies will be available. Use the drop-down arrows under each of the cookies to find more information on the cookie and see the creation date and expiry date of the cookie. Unless deleted or removed, the locally stored data will remain in the browser until the expiry date has passed.

You can remove all from this menu which will remove the stored data for fraslemobility.uk or you can remove all data for all locally stored data on the previous menu by selecting remove all.

Alternatively you can follow the steps below for a quicker process to deleting all cookies/stored data:

- Open Chrome and select the 'Browser' menu in the top right corner of the browser (3 small dots)
- Scroll down to and select 'History'
- Select 'History' again from the next available menu
- Select 'Clear Browsing Data' from the menu on the left-hand side of the browser
- Ensure you select 'All Time' from the time range drop-down menu
- Under the Clear Browsing Data menu, use the tick box for 'Cookies and Other Site Data'
- Select 'Clear Data'

Your Choices and Opting Out

Frasle Mobility gives you the choice of receiving a variety of information that complements our products and services. You can subscribe to receive certain product-and service-specific information and Frasle Mobility-wide marketing communications. If you are receiving communications from Frasle Mobility, this is either because you have provided us with permission to contact you in the past, or we believe that there is a lawful basis, such as legitimate interest or contractual fulfilment, for us to contact you.

Frasle Mobility-wide communications may include new product information, services and events. Frasle Mobility provides you the opportunity to “opt-out” of having your personal data used for certain purposes when we ask for this information. If you no longer wish to receive our communications, you may opt-out of receiving them by following the instructions included in each communication or by emailing us at info@fraslemobility.uk Please include “Opt-Out” in the subject-line.

Lawful Basis for the Processing of Personal Data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business systems and compliance processes mean that all personal data is processed on common, company-wide platforms. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

Purpose of collection	Information category	Data collected	Purpose of collection	Lawful basis for processing	Data shared with?	Retention period
1. To provide you with information	Subject matter information	Name, company name, geographic location, email address, business sector	To provide appropriate online of email information about products and services that you have requested	Contractual fulfilment	Internally only	Maximum 8 years from the date the information is collected
			To provide further, related, online or email information and ongoing news updates in relation to the identified area of interest	Legitimate interest	Internally only	
		Telephone number	Follow-up to ensure requested information meets needs and identify further requirements	Legitimate interest	Internally only	
		Personal contact information as provided through website forms or at trade shows or any other means	General mailing list subscription	Consent	Internally only	

2. Fulfilment information	Fulfilment data	Name, contact details	Licensing details necessary for allocation and maintenance of a license purchase for use of software and related products	Contractual performance	Internally and any third-party whose products or services you may have purchased from us	Maximum 6 years from the date of the performance of the contract
		Name, address(es), email address, contact details	Actual delivery of products or services, in physical or digital form, that you may have purchased from us	Contractual performance	Internally and any third-party logistics or supplier companies with whom we contract in order to fulfil these requirements	
3. Security	Security information	Technical information as described above, plus any other information that may be required for this purpose	To protect our websites and infrastructure from cyber-attacks or other threats and to report and deal with any illegal acts	Legitimate interest	Internally, forensic and other organisations with whom we might contract for this purpose	Relevant statutes of limitation
4. Communications	Contact information	Names, contact details, identification details	To communicate with you about any issues that you raise with us, or which follows from an interaction between us	Legitimate interest	Internally and, as necessary, with professional advisors	Relevant statutes of limitation

When we process personal information on the lawful basis of legitimate interest, we employ a three-part test before determining whether it is appropriate:

- Is there a legitimate interest behind the processing?
- Is the processing necessary for that purpose?
- Is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

Storage of Personal Data

Frasle Mobility is a Brazilian based company with offices in the UK.

- Our websites are hosted in the UK and are accessed only by our UK based staff
- Our IT Service Management, Asset Management, Customer Relationship Management, Marketing and Accounting systems are UK-based

- We use a range of Cloud Service Providers (CSPs) within our processing environment. Unless stated otherwise, we are, in respect of all these CSPs, the data controller.
- Unless we stated otherwise all CSPs that we use UK-located processing facilities
- We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are contained in the table above

Security Measures

We take appropriate technical and organisational measures when it comes to the security of your data including internal awareness of GDPR and privacy to any employees with access to or processing your personal data.

We do not have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

Your Rights as a Data Subject

You have the right to be informed which we hope we have satisfied by publishing this Privacy Notice. However, if you feel there is anything you need to know that you can't find here, please let us know.

You can make a request to see records we hold on you. If you would like to do this, please notify us that you wish to make a Data Subject Access Request, provide verification of who you are (so that we can tackle any fraudulent request) and state specifically what information you require.

If we hold any inaccurate or out of date information about you, let us put this right. You can ask us to update your personal data at any time and we'll endeavour to do this as soon as possible.

You also have the right to have your data erased; processing restricted to some activity only, the right to request we transfer your data to another controller and the right to object to us processing your personal data.

For any of the above requests, please email info@fraslemobility.uk specifying what it is you'd like us to do (or not do). We will consider your request carefully and get back to you on each occasion. We don't use your data as part of any automated decision making or profiling.

Terms and Conditions

If you choose to visit our Websites, your visit and any dispute over privacy is subject to this Privacy Policy and our Terms and Conditions, including, but not limited to, disclaimers of

warranty, limitations of liability, and arbitration of disputes.

Contact Us

Any comments, questions or suggestions about this Privacy Policy or our handling of your personal data should be emailed to info@fraslemobility.uk. Please include “Privacy” in the email subject. Alternatively, you can contact us using the following postal address or telephone number:

Postal Address:

GDPR Compliance

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