

PRIVACY POLICY

Controlled Document

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Confidentiality

Where indicated by its security classification above or below, this document includes confidential or commercially sensitive information and may not be disclosed in whole or in part, other than to the party or parties for whom it is intended, without the express written permission of an authorised representative of the COMPANY.

DO NOT USE THIS DOCUMENT IN PRINTED FORM WITHOUT FIRST CHECKING IT IS THE LATEST VERSION.

The definitive versions of all COMPANY's policies, procedures and documents appear on the company's Intranet and or its website(s) not on printed form, to ensure that up to date versions are used. If you are reading this in printed form, check the version number and effective from date is the most recent one as shown in the above electronic formats.

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1. INTRODUCTION

Rontec Watford Limited ("Rontec", "we", "our", "us") respects your privacy and is committed to protecting your personal data in accordance with the with the **UK GDPR**, the **Data Protection Act 2018**, the **Privacy and Electronic Communications Regulations (PECR)**, the **Data (Use and Access) Act 2025 (DUAA)**, and any other applicable laws and regulatory requirements.

This Privacy Policy explains how we collect, use, disclose and protect your personal data when you use our website(s), interact with us, submit a request, query, complaint or visit our premises (including sites where CCTV is in use).

This Privacy Policy should be read in conjunction with our Data Protection Policy & Guidelines.

2. DATA CONTROLLER

Any personal data provided to or collected by Rontec is controlled by Rontec Watford Limited as the registered data controller with the Information Commissioner's Office (ICO).

This policy applies across all Rontec locations and affiliated group companies.

This Privacy Policy also applies to Rontec's marketing content, including offers and advertisements for Rontec products and services, which we (or a service provider acting on our behalf) may send to you on third-party websites, platforms and applications based on your site usage information.

These third-party websites generally have their own Privacy Notice and Terms and Conditions. We encourage you to read them before using those websites.

3. PERSONAL DATA WE COLLECT

Personal data means any information that can be used to identify directly or indirectly a specific individual.

We may collect personal data from a variety of sources. This includes:

- Personal data you give us directly;
- Personal data we collect automatically; and
- Personal data we collect from other sources.

We may collect the following categories of data:

- Website data: IP address, browser type, browsing behaviour (via cookies);
- Contact details: Name, email, phone number;
- Transactional data: Orders, payments, service use;
- Complaints data: Written complaints, recordings of calls, case resolution info;
- CCTV footage: Video recordings at our forecourt sites (petrol station and stores), or office locations;
- Photographs: still images captured at our forecourt sites (petrol station and stores), events or office locations;
- Other: correspondence or data collected via online forms, customer surveys, or support requests.

4. HOW WE USE PERSONAL DATA

Rontec may share your personal data internally and with selected third parties in the following circumstances:

- **Internally:** your personal data may be used by us or shared with Rontec's group of companies for internal reasons, primarily for business and operational purposes such as:
 - in order to respond to your requests, queries, complaints;
 - provide services and process transactions;
 - maintain and improve our website and services;
 - protect site and premises security (via CCTV);
 - Marketing campaigns and newsletters.
- **Third-party service providers:** in order to make various services and materials available to you through our websites we may share your personal data with third-party service providers that perform functions on our behalf, such as companies that: host or operate Rontec's website(s), process payments, analyse data, provide customer service, postal or delivery services, and sponsors or other third-parties that participate in or administer our promotions. They have access to personal data needed to perform their functions but may not use it for other purposes. Further, they must process this personal data in accordance with this Privacy Policy and as permitted by applicable data protection laws and regulations;
- **Other third parties:** your personal data may also be used by us or shared with our sponsors, retail partners, advertisers, advertising networks, advertising servers, social media networks, and analytics companies or other third parties in connection with marketing, promotional, data enrichment and other offers, as well as product and or service information.
- **Legal disclosure:** we may transfer and disclose your personal data to third parties:
 - to comply with a legal obligation;
 - when we believe in good faith that an applicable law requires it;
 - at the request of governmental authorities conducting an investigation;
 - to verify or enforce our "Terms of Use" or other applicable policies;
 - to detect and protect against fraud, or any technical or security vulnerabilities;
 - to respond to an emergency; or otherwise
 - to protect the rights, property, safety, or security of third-parties, visitors to Rontec's websites, Rontec or the public.

5. LEGAL BASIS FOR PROCESSING

Our processing is based on one or more of the following legal grounds:

- Consent (e.g., for marketing);
- Contractual necessity (e.g., order fulfilment);
- Legal obligation (e.g., financial records);
- Legitimate interests (e.g., CCTV for security, customer support).

6. CCTV MONITORING

We operate CCTV systems in all our sites for safety and security purposes. Signs are posted where CCTV is in use.

We operate CCTV at our sites for the purpose of:

- Crime prevention and security;
- Health and safety monitoring;
- Incident Investigation and complaint resolution.

CCTV Data is:

- Clearly signposted;
- Accessed only by authorised personnel;
- Retained for a maximum of 30 days, unless retained longer for investigations.

7. PHOTOGRAPHS & IMAGE CAPTURE

We may take photographs or capture images (e.g. at our petrol stations, during events) for:

- Health and safety monitoring;
- Marketing and promotional purposes (with appropriate consent);
- Investigating incidents or managing premises security.

Images of individuals will only be retained where necessary for the stated purpose, and we will always obtain consent when using identifiable images for marketing, user profiles, or promotional materials.

8. CUSTOMER COMPLAINTS

When you contact us with a complaint, we collect only the data necessary to:

- Investigate and resolve your issue;
- Maintain service records;
- Comply with legal or regulatory obligations.

9. SHARING PERSONAL DATA

We may share your data with:

- Service providers and IT support partners;
- Delivery and payment processing providers;
- Legal/regulatory bodies, courts or enforcement agencies (if required);
- Other Rontec group entities for operational purposes.

We never sell personal data.

10. INTERNATIONAL DATA TRANSFERS

Where personal data is transferred outside the UK of EEA, we ensure safeguards are in place such as:

- transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK and the European Commission, including the Privacy Shield in the US;
- the use of Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs) are in place.

11. DATA SECURITY

We use appropriate physical, digital and organisational safeguards to secure your data, including:

- Encryption, firewall protection, and multi-factor authentication;
- Secure storage for CCTV, complaints data;
- Compliance with PCI-DSS and cybersecurity best practices;
- Regular system monitoring, penetration testing, and access control.

12. DATA BREACH NOTIFICATION

In the event of a data breach that may risk your rights and freedoms, we will notify affected individuals and the ICO within 72 hours in accordance with our internal breach response procedures.

13. YOUR RIGHTS

Under the data protection law, you have the right to:

- Access your data;
- Request correction or deletion;
- Restrict or object to processing;
- Request portability of your data;
- Withdraw consent where applicable;
- Log a complaint with the Information Commissioner's Office (ICO)

14. DATA SUBJECT REQUESTS

You have the right to request access to your personal data held by us. This is known as a Data Subject Access Request (DSAR).

To make a DSAR, you should:

- Submit your request in writing using the [Data Protection Contact Us Form](#).
- Include your full name, contact details, and a description of the data you wish to access. Provide valid proof of identity (e.g., passport or driving licence).

We will:

- Acknowledge your request within 3 working days;
- Respond to your request within 30 calendar days (or inform you if more time is needed);
- Inform you if we need to redact third-party data (with an associated potential cost); or

- Restrict access based on lawful exemptions.

Should you have any questions please contact our Legal & Compliance Officer who acts as Rontec's Data Protection Officer on sandra.baptista@rontec.uk.com.

14.1 Personal Data (GDPR) Related Complaints

If you are not satisfied with the outcome of your request, you can escalate or raise a complaint by completing the [Data Protection Contact Us Form](#) and select the option Personal Data (GDPR) Related Complaint.

You also have the right to log a complaint directly with the Information Commissioner's Office (ICO)

15. DATA RETENTION

We retain personal data only as long as necessary.

The table below outlines the recommended retention periods for different categories of data that may be processed by Rontec, including records of Data Subject Access Requests (DSARs). These retention periods are based on UK GDPR Principles, ICO guidance and operational best practices.

Data Type	Data Retention Period	Justification
Website Activity Logs	Up to 12 months	Website analytics and system diagnostics
CCTV Footage	Up to 30 days	ICO guidance and proportionality
Customer Complaints	Up to 6 years	Statutory limitation for legal claims
Routine Data Subject Access Requests (no complaint/legal issue)	12 months	Evidence of compliance and follow-up traceability
Data Subject Access Requests (with internal complaints/escalation)	2 years	Internal review, dispute resolution
Data Subject Access Requests (involved in legal/HR or regulatory issues)	3-6 years	Potential evidence in legal or HR matters
Marketing Consent Records	Until consent is withdrawn	UK GDPR – Consent basis
Photos	Until consent is withdrawn	UK GDPR – Consent basis
Cookies Consent	Until consent is withdrawn	UK GDPR – Consent basis

16. POLICY REVIEW & UPDATES

This policy will be reviewed and updated as necessary to ensure ongoing compliance with legal, regulatory, and operational change. The latest version will always be available on our website with the date of revision clearly stated.

17. DOCUMENT HISTORY

17.1 Key Information

Revision History:

Version	Date	Summary of Changes	Initials	Changes Marked
0.1	April 2017	Policy created	CP	
1.0	April 2017	Policy approved	GT	
2.0	May 2018	Legislation changes due to GDPR	GT	
3.0	May 2019	Yearly review with no changes made	GT	
4.0	May 2020	Yearly review with no changes made		
5.0	May 2021	Yearly review with changes made due to Legislation changes - Brexit and GDPR updates	GT	
6.0	June 2022	Yearly review with no changes made	GT	
7.0	June 2023	Policy approved	GT	
7.01	June 2024	Yearly review with no changes made	SB/GT/TC	
8.0	June 2024	Policy approved	GT	
8.01	June 2025	Yearly review with some minor changes	SB/GT/TC	
9.0	June 2025	Policy approved	GT	

Approvals: This document has been approved by

Name/Title	Date	Version
Giles Taylor – Managing Director	April 2017	1.0
Giles Taylor – Managing Director	May 2018	2.0
Giles Taylor – Managing Director	May 2019	3.0
Giles Taylor – Managing Director	May 2020	4.0
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Giles Taylor – Managing Director	June 2022	6.0
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Document Title:	Document Ref
Data Protection Policy	RONTEC-GOV-POL-015
Website Terms & Condition of Use	RONTEC-GOV-T&CS-002-V2.0
Cookies Policy	RONTEC-GOV-POL-008-V9.0

18. APPENDICES

18.1 Privacy Key Terms

Below is a list of recurring terms in Rontec's privacy notices and procedures.

Key Term	Definition
Anonymisation	The process of permanently removing any personal identifiers from personal data, so that the individuals whom the data describe remain anonymous. This is done for the purpose of protecting individuals' private activities while maintaining the integrity of the data gathered and shared.
Behavioural Advertising	The act of tracking users' online activities and then delivering ads or recommendations based upon the tracked activities.
Binding Corporate Rules (BCRs)	Personal data protection policies which are adhered to by a controller or processor for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity.
Biometric Data	Personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, including facial images or dactyloscopy data or iris related data.
Consent	Any freely given, specific, informed and unambiguous indication by way of a written declaration or an affirmative action signifying a data subject's agreement to the processing of personal data relating to him.
Cookies	A small text file stored on a user machine that may later be retrieved by a web server from the machine. Cookies allow web servers to keep track of the end user's browser activities and connect individual web requests into a session.
Data Controller	Any natural or legal person, public authority, non-governmental organisation, agency or any other body or entity which alone or jointly with others determines the purposes and means of the processing of personal data.
Data Processing	Any operation performed on personal data, including but not limited to collection, storage, preservation, alteration, retrieval, disclosure, transmission, making available, erasure, destruction of, consultation, alignment, combination, or the carrying out of logical or arithmetical operations on personal data.
Data Protection Authority	The designated regulatory body established under the Personal Data Protection Act.
Data Protection Officer	The individual appointed by Rontec to carry out certain responsibilities and functions in respect of privacy and data protection.
Data Retention	The policies and processes used within Rontec for determining the time period for archiving and storing of personal data.
Data Subject	An identified or identifiable natural person, alive or deceased, to whom the personal data relates.
Direct Marketing	A form of advertising in which companies provide physical marketing materials to consumers to communicate information about a product or service.
Encryption	The method by which plain text or any other type of data is converted from a readable form to an encoded version that can only be decoded by another entity if they have access to a decryption key

Financial data	any alpha-numeric identifier or other personal data which can identify an account opened by a data subject, or card or payment instrument issued by a financial institution to a data subject or any personal data regarding the relationship between a financial institution and a data subject, financial status and credit history relating to such data subjects, including data relating to remuneration.
Genetic Data	Personal data relating to the genetic characteristics of a natural person which gives unique information about the physiology or the health of that natural person and which results, from an analysis of a biological sample or bodily fluid of that natural person.
Health Data	Personal data related to the physical or psychological health of a natural person, which includes any information that indicates his health situation or status.
Identifiable natural person	a natural person who can be identified, directly or indirectly, by reference to any personal data
International Organisation	An organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.
IP Address	A unique address that identifies a device on the Internet or a local network and which allows a system to be recognized by other systems connected via the Internet protocol.
Online Behavioural Advertising	Websites, emails or online advertising services that engage in the tracking or analysis of, e.g., search terms, browser or user profiles, preferences, demographics, online activity, offline activity, location data, and offer advertising based on that tracking.
Personal Data	Any information that can identify a data subject directly or indirectly by reference to an identifier such as a name, an identification number, location data or an online identifier, or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that individual or natural person.
Personal Data Breach	Any act or omission that results in accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
Privacy and Data Protection	The collection of laws and regulation that applies to the collection, usage, storage, protection and other processing of personal data. This includes data protection, privacy, banking secrecy, electronic communications and confidentiality laws and regulations, and any other applicable laws or regulations to the extent they relate to privacy of personal data.
Personal Data Protection Act	The Data Protection Act 2018 (the "Data Protection Act") and the UK GDPR (as defined in the Data Protection Act).
Processor	A natural or legal person, public authority, agency or other entity established by or under written law which processes personal data on behalf of the controller.
Profiling	processing of personal data to evaluate, analyse or predict aspects concerning that data subject's performance at work, economic situation, health, personal preferences, interests, credibility, behaviour, habits, location or movements.
Pseudonymization	The processing of personal data in such a manner that the personal data cannot be used to identify a data subject without the use of additional information, and such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data is not attributed to a data subject.
Recipient	A natural or legal person, to whom the personal data is disclosed, or a public authority or any incorporated or unincorporated body to which the personal data is disclosed.
Restriction of Processing	The marking of stored personal data with the aim of limiting their processing in the future.

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Special Categories of Personal Data	personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, financial data the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person data concerning health, or data concerning a natural person's sex life or sexual orientation personal data relating to offences, criminal proceedings and convictions, or personal data relating to a child;
Supervisory Authority	Independent Authority or division associated with an Authority in any relevant jurisdiction, whose primary purpose and function is to regulate matters related to personal data.
Third-Party	A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who are under the direct authority of the controller or processor, are authorized to process personal data
Tracking Technologies	Tracking technologies are technologies used to collect information about individuals and their use of the internet online services, and emails, such as what website a user visits, how long is spent on a site, what the user's location is, what the IP address of the device is or if an email has been opened and what contents was clicked on and so on. Examples of tracking technologies include but are not limited to cookies, tags, web beacons, emails and embedded scripts.