

TVR Self Drive Customer Privacy Notice

Registered name: Pink Spade Limited

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Post **Transit House, 19 Bankside, Kidlington, Oxfordshire, OX5 1JE**
Telephone **01865 842852**
Email **annie@tvr-selfdrive.co.uk**

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery:**

- Names and contact details
- Addresses
- Date of birth
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Account information
- Website user information (including user journeys and cookie tracking)
- Photographs or video recordings
- Call recordings
- Identification & visa documents
- Information relating to compliments or complaints

We collect or use the following information for **the operation of customer accounts and guarantees:**

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Account information, including registration details
- Information used for security purposes

We collect or use the following information for **service updates or marketing purposes:**

- Names and contact details
- Addresses
- Marketing preferences
- Website and app user journey information

We collect or use the following information to **comply with legal requirements:**

- Name
- Contact information
- Identification documents

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Video recordings of public areas
- Video recordings of private or staff only areas
- Call recordings
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Information relating to health and safety
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- **Your right to erasure** - You have the right to ask us to delete your personal information.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information.
- **Your right to object to processing** - You have the right to object to the processing of your personal data.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

As a vehicle hire company, we collect and use personal information to provide safe, reliable, and efficient vehicle rental services. Our legitimate interests for processing personal data are as follows:

Providing and Managing Vehicle Hire Services

We collect personal information such as name, contact details, driver’s licence information, and payment details to:

- Verify the identity and eligibility of customers to rent a vehicle.
- Process bookings, payments, and rental agreements.
- Ensure compliance with legal and regulatory requirements for renting a vehicle (eg verifying a valid driver’s license).

By collecting this information, we ensure that customers receive a seamless and legal car rental experience.

Ensuring Safety and Preventing Fraud

To maintain safety and prevent fraudulent activities, we use personal data to:

- Verify driver identity to reduce the risk of identity theft and unauthorised rentals.
- Prevent and detect fraudulent transactions or misuse of rental vehicles.
- Monitor vehicles using GPS tracking and telematics (if applicable) to prevent theft and recover lost or stolen vehicles.

This benefits customers by ensuring a safer rental experience, protecting their personal data, and reducing potential financial loss.

Providing Customer Support and Communication

We use contact details to:

- Send booking confirmations, reminders, and important rental updates.
- Respond to customer inquiries, complaints, or service requests.
- Notify customers about road safety regulations, emergency procedures, or vehicle recalls.

This ensures customers receive timely assistance and critical information related to their rental.

Improving Services and Enhancing Customer Experience

We analyse rental history and customer feedback to:

- Improve our services and streamline the booking process
Offer personalised promotions, loyalty rewards, and discounts based on rental preferences.
Identify areas for service improvement, such as fleet expansion or better customer support.
- This benefits customers by making car and van rental more convenient, affordable, and suited to their needs.

Compliance with Legal and Regulatory Requirements

As a vehicle hire company, we must collect and process certain personal information to:

- Comply with road safety laws, insurance requirements, and financial regulations.
- Cooperate with law enforcement in case of traffic violations, Penalty Charge Notices, accidents, or criminal investigations involving rental vehicles. This protects both the company and customers by ensuring legal compliance and accountability.

Balancing Benefits and Risks

We recognise that collecting personal information carries risks, such as data security concerns.

However, we take strong measures to protect customer data:

- Only collecting necessary data for legitimate purposes.
- Implementing secure data storage and encryption to protect personal information.
- Allowing customers to access, update, or request deletion of their personal data where applicable.

The benefits of collecting personal data—such as enhanced security, legal compliance, and improved customer service—far outweigh the risks, as long as data is handled responsibly and transparently. We ensure that our practices align with data protection regulations (eg GDPR) and prioritize customer trust and privacy.

Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

As a car and van hire company, we collect and use personal information for the operation of customer accounts and guarantees to ensure a smooth, secure, and reliable rental experience. Our legitimate interests for processing this data are as follows:

Managing Customer Accounts Efficiently

To provide customers with a convenient and seamless rental experience, we collect personal details such as name, contact information, driver’s licence details, and payment information. This allows us to:

- Create and maintain customer accounts for easier future bookings.
- Store rental history and preferences for personalised service.
- Provide a quicker and more efficient booking process for returning customers. This benefits customers by reducing the time and effort required to book a vehicle while ensuring a reliable record of their rentals.

Verifying Customer Identity and Eligibility

We use personal data to confirm the identity and eligibility of customers before allowing them to rent a vehicle.

This includes verifying:

- Driver’s licence validity and age requirements.
- Payment details to secure bookings and prevent fraud.
- Previous rental history to identify responsible renters.

This helps prevent unauthorised rentals, fraud, and misuse of vehicles, ensuring a safe and secure service for all customers.

Managing Deposits, Payments, and Guarantees

To protect both the company and customers, we process financial information to:

- Secure rental payments and deposits and ensure customers can cover potential damages or fines.
- Provide guarantees or pre-authorisations to prevent financial loss from unpaid charges.
- Offer flexible payment options, including refunds or adjustments if needed. By doing this, we minimise financial risks while ensuring customers have a transparent and fair payment experience.

Ensuring Compliance with Legal and Insurance Requirements

Personal data is necessary to meet legal and insurance obligations, such as:

- Verifying that customers meet insurance criteria for vehicle rental.
- Managing claims or disputes related to accidents, damage, or traffic violations.
- Cooperating with authorities in cases of theft, fraud, or legal investigations.

This benefits customers by ensuring they are protected under the correct insurance policies and that their rental complies with the law.

Enhancing Security and Preventing Fraud

Collecting and processing personal information allows us to:

- Detect and prevent fraudulent transactions or unauthorised use of accounts.
- Reduce the risk of identity theft and ensure customers' accounts are protected.
- Monitor unusual account activity to prevent misuse of services. This safeguards both the company and customers from financial and security risks.

Balancing Benefits and Risks

We recognise the importance of privacy and take steps to ensure that our data collection practices are fair and necessary:

- We only collect data required for account management, identity verification, and guarantees.
- Customer data is stored securely and only used for legitimate business purposes.
- Customers have control over their data, including the ability to update or request deletion where applicable.

The benefits—such as improved security, fraud prevention, efficient account management, and compliance with legal requirements—significantly outweigh the risks. Our practices are aligned with data protection regulations (eg GDPR) to ensure fairness, transparency, and customer trust.

Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

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Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

As a vehicle hire company, we collect and use personal information for service updates and marketing purposes to keep customers informed and provide relevant offers. Our legitimate interests for processing this data include:

Keeping Customers Informed with Important Service Updates

We use personal information such as contact details (email, phone number) to send essential service updates, including:

- Changes to booking policies, rental terms, or pricing.
- Safety alerts, including recalls or vehicle-specific notifications.

These updates benefit customers by ensuring they have the latest information, helping them make informed decisions and avoid inconveniences.

Providing Relevant Promotions and Special Offers

We use customer preferences, rental history, and location data to send personalised promotions, including:

- Discounts, loyalty rewards, and exclusive offers for frequent renters.
- Seasonal promotions or early-bird booking deals.
- Special upgrades or add-ons tailored to the customer's rental habits.

This benefits customers by helping them save money and access deals that are relevant to their needs.

Improving Customer Experience with Personalised Recommendations

By analysing past rentals and preferences, we can suggest:

- Suitable vehicle options based on previous choices. This makes renting a car more efficient and tailored to the customer's needs.

Balancing Benefits and Risks

We understand that customers value their privacy, so we:

- Only send marketing communications with appropriate consent (where required by law).
- Provide clear opt-out options in every marketing message.
- Ensure all personal data used for marketing is securely stored and only used for legitimate purposes.

The benefits—such as staying informed, receiving relevant offers, and improving customer service—outweigh the risks when data is handled responsibly. We comply with data protection regulations (eg GDPR) and prioritise transparency and customer choice.

Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

As a vehicle hire company, we collect and use personal information to effectively handle customer queries, complaints, and claims. Our legitimate interest is to ensure that any issues are resolved fairly, efficiently, and transparently while maintaining high service standards.

Responding to Customer Queries Efficiently

We collect personal details such as name, contact information, rental history, and payment details to:

- Address inquiries about bookings, vehicle availability, pricing, and policies.
- Provide support for technical issues, such as online booking difficulties or account access problems.
- Ensure that responses are accurate and relevant to the customer's situation.

Benefit to customers: This allows for quick and effective assistance, ensuring a smooth and hassle-free rental experience.

Investigating and Resolving Complaints

To fairly assess and resolve complaints, we may use rental records, vehicle tracking data, payment history, and communication logs to:

- Verify the details of a complaint and provide an appropriate resolution.
- Identify recurring service issues and improve future customer experiences.
- Ensure fair treatment of both customers and staff in disputes.

Benefit to customers: This ensures transparency, accountability, and fair resolution of complaints, improving overall service quality.

Handling Insurance or Damage Claims

In case of accidents, damages, or disputes over charges, we may need to collect and process personal information, such as:

- Rental agreements, driving license details, and vehicle usage data.
- Photographs or reports related to damages.
- Communication records between the company, the customer, and third parties (eg insurers, law enforcement).

Benefit to customers: This ensures that claims are handled fairly and efficiently, protecting customers from wrongful charges and ensuring proper insurance coverage.

Preventing and Resolving Payment Disputes

We use personal information to:

- Investigate billing discrepancies and process refunds if necessary.
- Verify payment records to resolve disputes over charges.
- Ensure compliance with financial regulations and fraud prevention policies.

Benefit to customers: This helps protect customers from incorrect charges, fraudulent claims, or unfair penalties.

Balancing Benefits and Risks

We recognise the importance of protecting customer data while handling complaints and claims. To safeguard privacy:

- We only collect relevant information necessary to resolve issues.
- Customer data is stored securely and accessed only by authorised personnel.
- Data retention is limited to the necessary period required for legal or service purposes.

The benefits—such as faster issue resolution, improved service quality, and fair handling of disputes—outweigh any risks, as long as personal data is managed responsibly. We comply with data protection laws (eg GDPR) to ensure fairness, transparency, and customer trust.

Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where we get personal information from

- Directly from you
- Debt collection agencies
- Insurance companies
- Legal and judicial sector organisations
- Schools, colleges, universities or other education organisations
- Councils and other public sector organisations
- Publicly available sources
- Providers of marketing lists and other personal information
- Suppliers and service providers

How long we keep information

- Personal information is kept indefinitely.



Who we share information with

Others we share personal information with

- Insurance companies
- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Professional consultants
- Organisations we're legally obliged to share personal information with
- Emergency services

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office, Wycliffe House

Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Last updated 24.3.25

TVR Self Drive – Privacy Policy



- **CARS**
- **VANS**
- **MINI-BUSES**
- **MPV'S**