

QUEENSMEAD AUTO SERVICES LIMITED

QUEENSMEAD AUTO SERVICES LTD PRIVACY NOTICE

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Version: May 2026

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Privacy Notice

We ask that you read this Privacy Notice carefully.

The Privacy Notice is intended to provide you with important information about who we are and how and why we collect, use, process and share your personal information when you contact us or we contact you, when you use or receive our services, when you supply us with your services, or you use our website.

The Privacy Notice also explains your rights in relation to your personal information and how to contact us and supervisory authorities in the event you have a complaint.

Changes to this Privacy Notice

We regularly review, and where necessary update, this Privacy Notice. This version was last updated in May 2026.

Who we are

Full name: Queensmead Auto Services Ltd, trading as Movement Auto Services
Registered Office: 121, Walton Way, Aylesbury, Buckinghamshire, HP21 7JP
Telephone number: 01296 393 535
Website: www.ukmovement.com

Data Controller

Queensmead Auto Services Ltd ("**Queensmead**") is a Data Controller. We are a Data Controller when we determine the purposes for collecting certain personal data about you and make decisions about how to process that data. As the Controller of your personal data, we are regulated under the UK General Data Protection Regulation (UK GDPR) and we have responsibilities under these regulations.

QUEENSMEAD AUTO SERVICES LIMITED

Data Processor

Queensmead is also a Data Processor. We are a Data Processor when we process personal data on behalf of another Data Controller, as when processing data that is provided to us so we can fulfil the supply of services to the clients of our business (who are the Data Controllers for whom we are acting as Data Processor) in relation to the delivery and collection of vehicles, the provision of chauffeuring and driver services, the provision of our fleet management and booking service and all associated logistical, financial, management and administrative requirements which we deal with on behalf of our clients.

Your responsibilities

By supplying your services to us or engaging us to provide our services to you, you are accepting responsibility for bringing the information in this Privacy Notice to the attention of any individual whose personal data may be collected, supplied and processed in the manner set out in this Privacy Notice.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if any personal data changes during the period of your relationship with us.

2. THE PERSONAL DATA WE PROCESS AND WHY

Personal data, or personal information, means any information about an individual from which that person can be identified.

It does not include data where the identity has been removed (anonymised data).

Why we process personal data

As a Data Controller, Queensmead collects your personal data for specific purposes.

These purposes vary according to the nature of our relationship with you but, by way of example, in relation to our provision of services to you, these purposes include quoting for or assessing a request to provide a service, onboarding a customer or client, fulfilling the contract, logistics administration, ID verification, vehicle handover, invoicing (to include the management and receipt of payments and charges), managing the business relationship, handling, managing and resolving queries, incidents, accidents and complaints, and complying with legal and regulatory obligations. With respect to engaging your services, we collect personal data for such purposes as obtaining a quote, assessing your suitability for service provision, onboarding, payment and ongoing management of the business arrangement. In addition, in order to promote our business, we may process personal data for marketing and direct marketing purposes.

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Whose personal data we process

In the course of dealing with your affairs, Queensmead may process the personal data of several categories of individuals.

As a client, a customer, a supplier or a user of our website, this personal data may concern you as an individual or, where you are not an individual, it may concern the data of your representatives – your employees or your agents, for example – and may also concern the data of your own customers and clients, such as the users of vehicles that are delivered or collected.

Where we get personal data from

As a Data Controller, Queensmead uses different means by which to collect personal data from and about you.

Our chief means of obtaining personal data is via direct interaction. This means we usually obtain much of this information from you as an individual, a supplier, a customer, or a client. Personal data is provided in this way when you correspond with us by post, telephone, e-mail, messaging, social media platforms, Apps, or via our website, for instance. Personal data is also obtained via direct interaction if you fill out a form or meet us in person, make an enquiry, use our services, request that information be sent to you or provide us with feedback.

We also obtain personal data from other sources, such as third parties and publicly available resources. This is particularly relevant where our purpose is to perform due diligence checks before engaging the services of a supplier, for instance. In these cases, we may obtain personal data by taking up references, from credit reference agencies or from publicly available reviews. Where our purpose is to engage in direct marketing to reach out to potential new customers, we may also obtain personal information from publicly available sources such as trade publications, press releases, company websites and other resources on the internet, or from professional networking sites such as LinkedIn.

Our website does not collect any technical data or information on users and the site neither stores nor records the user data submitted via contact or enquiry forms. Please see our Policy Regarding the Use of Cookies and Personal Data on the Queensmead Website for further information.

As a Data Processor, Queensmead is provided with personal data by the Data Controller (or their representative, agent, client or customer) under whose instruction we process it.

The categories of personal data we process

The nature of our relationship with you determines the different categories of personal data we process. As a Data Controller, we collect the personal data that is relevant to our specific purposes for processing. As a Data Processor, we process the personal data provided by the Data Controller in accordance with their instructions.

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The different kinds of personal data we process have been grouped into categories below. Please note that our use of the personal data within these categories is limited to the minimum amount necessary for the purposes for which the data is processed.

- **Identity Data** (such as your first name, last name, date of birth, photograph, signature, title, job role or position, username or similar identifier)
- **Identity Verification Data** (including photographic identification documents such as your driving licence or your passport)
- **Contact Data** (such as your home address, work address, delivery address, collection address, e-mail address and telephone numbers)
- **Financial Data** (such as your billing address, your debit card, credit card or bank information, invoices and their supporting documentation, and details about other payments to and from you)
- **Transaction Data** (such as details of services you have supplied to us or we have supplied to you, details about what queries have been raised and what information has been requested, details of correspondence and records of meetings and decisions)
- **Marketing and Communications Data** (such as your preference regarding the receipt of marketing messages from us and your preferred means of communication)
- **Special Categories of Personal Data** (defined by the UK GDPR as data revealing your racial or ethnic origin, your political opinions, your religious or philosophical beliefs, your trade union membership, your genetic data, your biometric data where this is used for identification purposes, data concerning your sex life, sexual orientation and your health). As a Data Controller, we do not typically collect Special Category Data about our customers, clients, suppliers and website users but, as a Data Processor, we may be provided with this data by the Data Controller. Where this happens, our processing of this data typically relates only to your health data. This includes any information related to your physical or mental health - injury, disability, diagnosis, disease, etc.
- **Criminal Conviction and Offence Data** (defined by the UK GDPR as personal data relating to criminal convictions and offences or related security measures.) This category covers a wide range of information, including suspicion or allegations of criminal activity, personal data about penalties, civil measures that may lead to a criminal penalty if not adhered to, and information relating to the absence of convictions. As Data Controller, we do not typically collect Criminal Conviction and Offence Data about our customers, clients, suppliers and website users but, as a Data Processor, we may be provided with this category of personal data by the Data Controller. Where this happens, our processing of this data typically relates to traffic offences. (We may, additionally, process data relating to civil offences such as parking infringements.)

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- **Driving Licence Data** (such as information contained on your licence, information obtained from the DVLA, historical driving information, the presence or absence of penalties, points and infringements)
- **Vehicle Data** (such as the registration number or VIN, details of any user-related adaptations and photographs)
- **Vehicle User Data** (such as Identity and Contact Data, delivery and collection addresses, parking and permit data, user-specific special instructions and details appertaining to the loan and / or purchase of the vehicle)
- **Insurance, Liability, Warranty and Indemnity Data** (such as where this contains personal information)
- **Account Data** (such as registration details, information used for security purposes and account history)
- **Due Diligence Data** (such as information about you that has been obtained from references you have provided, credit reference information and data from other such checks)
- **Any Data** you choose to communicate to the Company
- Any other personal information required by us to comply with our legal obligations and to fulfill our contractual obligations with you.

If you choose not to provide us with personal data

You are not obliged to provide us with personal data. However, where we need to collect personal data by law, or to enter into or fulfil a business arrangement we have with you, if you choose not to provide us with personal data it may prevent us from doing what we are legally required to do or delay or prevent us from fulfilling our contract with you. It may also mean that we will be unable to perform, or properly perform, the services we are engaged to provide.

3. HOW WE PROCESS PERSONAL DATA

Queensmead only processes your personal data where we have a legal basis to do so. As a Data Controller, we rely on the legal bases set out below for our processing.

Where Queensmead is a Data Processor, we process your data in accordance with the instructions of the relevant Data Controller. It is they who will have determined the purpose and the lawful basis for the processing activity.

The lawful bases we rely on

- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

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For example: where our purpose is to promote our business by publishing a customer's testimonial on our company website.

Where we rely on the lawful basis of consent, you have the right to withdraw your consent at any time.

- **Performance of a contract with you:** We rely on the lawful basis of contract where the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request before entering into a contract.

For example: where our purpose is to respond to your request that we provide you with a quote for a vehicle movement.

- **Legal obligation:** We rely on the lawful basis of legal obligation where we need to comply with a legal obligation to which we or our Data Controller are subject.

For example: where we are required to process and store customer, client or supplier invoices, receipts and payment details for tax and auditing purposes.

- **Legitimate interests:** We rely on the lawful basis of legitimate interests where the processing of your data is necessary for the purposes of our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

For example: where our purpose is to establish a record of when a driven vehicle is in our care and the condition of the vehicle during that time. The basis for our legitimate interests in this example is that this record enables us to establish liability for vehicular damage and any other occurrences such as speeding or non-payment of emission charges that may occur.

Where additional conditions are required for processing

- **Special Category Data:** may only be processed where both a lawful basis and a separate condition for processing have been identified.

For example: where the processing of personal data concerning your health is necessary (such as when arranging to accommodate the needs of disabled drivers or passengers), the Data Controller may rely on the lawful basis of legal obligation and the condition of Employment, social security and social protection in Schedule 1 of the Data Protection Act 2018.

- **Criminal Convictions and Offences Data:** may also only be processed where both a lawful basis and a specific condition for processing have been identified.

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For example: where the processing of personal data is necessary to deal with notifications of traffic offences, the Data Controller may rely on the lawful basis of legal obligation and the specific condition of preventing or detecting unlawful acts in Part 2 of Schedule 1 of the Data Protection Act 2018. In circumstances where such data is also processed in connection with actual or prospective legal proceedings arising from traffic incidents, the Data Controller may instead rely on the condition of Legal claims in Part 3 of Schedule 1 of the Data Protection Act 2018.

Please note that the same category of personal data may be used for more than one purpose and that we may process your personal data without your knowledge or consent where this is required or permitted by law.

Automated decision-making

An automated decision means a decision based solely on automated processing with no meaningful human involvement.

You have the right to request that a Data Controller stops making such automated decisions using your personal data.

Queensmead will make no decisions which have a legal or similarly significant impact upon you solely on the basis of automated decision making.

Marketing, direct marketing and your right to object

Where we process personal data for the purposes of promoting our business – such as when publishing a customer’s testimonial on our website – we will only do this if we have your specific consent.

Queensmead may also collect and use your personal data for direct marketing purposes – that is, for the purpose of directing our marketing material to particular individuals. If you are an individual or a sole trader, we rely on the lawful basis of consent for this purpose. Where we engage in business-to-business marketing – having sourced your business contact details from your employer’s website, for example – we rely on the lawful basis of legitimate interests (these being to grow our business by reaching out to potential new customers).

In all cases, we will get your consent before we share your personal data with any third party for the purpose of marketing ourselves.

You have an absolute right to object to or opt out of direct marketing at any time. You can also change your mind and withdraw your consent. You can exercise these rights by contacting us.

Please be aware, however, that we may still need to process a small amount of your personal data for the purpose of maintaining a “do not contact” list to ensure we do not contact you for direct marketing purposes in the future.

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Cookies

We do not use performance, tracking, or advertising cookies on our website. Please see our Policy Regarding the Use of Cookies and Personal Data on the Queensmead Website for further information.

4. WHO WE SHARE PERSONAL DATA WITH

In accordance with the purposes for which Queensmead may process your personal data, your data will be shared, where necessary, with the categories of recipients set out below.

- **Queensmead employees** (management and administration). Authorised employees will have access to personal data which is relevant to their function – for example, arranging and enabling the receipt and supply of services, fulfilling logistical services, administering the fleet booking and management service, administering financial responsibilities, communicating with recipients of our service provision and generally managing the administration that results from our core business and the fulfilment of our relationship with you.
- **Queensmead drivers** (employed and self-employed). Where appropriate, authorised drivers will have access to personal data which is relevant to their function – to facilitate the delivery and collection of vehicles, for example, to fulfil chauffeuring requirements and provision of driver services and to communicate with all relevant parties involved with the services provided as they relate to our core business and the general fulfilment and administration of our relationship with you.
- **Suppliers and external third parties.** Where necessary, Queensmead may share your personal information with others where the provision of their services is necessary for the performance of our business. This includes our supply chain chauffeuring and transporter companies, providers of IT and system administration services, providers of electronic proof of delivery systems, professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services, insurance companies and the DVLA, breakdown / recovery service providers, the emergency services, HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, lease, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

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5. INTERNATIONAL TRANSFERS OF PERSONAL DATA

We may transfer personal data outside of the UK to third countries or international organisations only in accordance with Chapter 5 of the UK GDPR (as amended by the Data (Use and Access) Act 2025). Under the Data (Use and Access) Act 2025 (DUAA), international transfers are permitted where the level of protection in the destination country is not materially lower than the provision provided under UK law.

Accordingly, we may transfer personal data outside the UK to a third country or international organisation only if one of the following conditions is satisfied (Chapter 5 of the UK GDPR as amended by section 85 and Schedules 7, 8 and 9 of the DUAA):

1. Adequacy decision – The Secretary of State has decided that the third country or international organisation provides a level of protection that is not materially lower than the standard under UK law (the new “data protection test” introduced by the DUAA).
2. Appropriate safeguards – Suitable safeguards are in place, such as:
 - the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses;
 - binding corporate rules; or
 - other mechanisms approved by the Secretary of State or the ICO.
(Where relevant, the data protection test is also applied to these safeguards.)
3. Specific derogations (Article 49 UK GDPR) – One of the limited exceptions applies, for example:
 - explicit consent from the data subject;
 - the transfer is necessary for the performance of a contract with the data subject;
 - the transfer is necessary to protect the vital interests of the data subject (or another person) where consent cannot be obtained;
 - the transfer is necessary for important reasons of public interest; or
 - the transfer is necessary for the establishment, exercise or defence of legal claims.

6. DATA SECURITY

Queensmead takes the security of personal data seriously. We have technical and organisational measures in place to ensure its appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction and damage.

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Where personal data is processed on our behalf, Data Processors must also respect the confidentiality and security of personal data and implement appropriate technical and organisational measures to ensure it is treated in accordance with data protection laws.

In the event of a data breach

In the event of a data breach, Queensmead has a comprehensive policy to manage its detection, investigation, reporting and management. An internal breach register is in place to demonstrate the handling of a breach and effectiveness of the implemented security measures regarding the handling of a data breach. Queensmead will notify you and any regulator on becoming aware of a personal data breach or suspected breach where we are legally required to do so and without undue delay.

7. HOW LONG WE KEEP PERSONAL DATA FOR

Queensmead will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for. This includes the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

Where data is not subject to legally defined retention periods, in determining the appropriate retention period for personal data Queensmead considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means. Different purposes have different retention requirements such that some circumstances enable personal data to be destroyed as soon as it becomes redundant or obsolete whereas, for other purposes, it is necessary for some data to be retained for reasons that include allowing us to meet our business needs or assisting us in responding to a question or a complaint.

On occasion, when some data has reached the end of its retention period, it may need to be reviewed to ensure that it is no longer required before it is destroyed. Where data has reached the end of its retention period, it is securely destroyed. Paper records are shredded and documents stored in electronic systems are either deleted or put out of use.

Where we have received a service and / or goods from you, where it is necessary to enable us to comply with legal requirements and to deal with or raise queries or issues, we will typically retain data for up to seven years after we stop receiving the service. If we have bought goods from you that we expect to last more than six years (such as equipment or machinery), we retain the relevant data for longer than six years.

Where we have provided you with a service, where it is necessary to enable us to comply with legal requirements and be able to deal with any queries or issues that may arise, we will typically retain data for up to seven years after we cease providing that service. This is subject to any specific alternative agreement concerning data retention that we have with you.

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We may keep your personal information for longer than seven years if we are obliged to keep it for legal, regulatory or technical reasons.

8. YOUR DATA PROTECTION RIGHTS

Under data protection laws, you have rights in relation to your personal data. Not all these rights are absolute, and they may only apply in certain circumstances.

You have:

- the right to be informed
- the right of access to your personal data and to obtain a copy on request
- the right to correction of your personal data (also known as rectification)
- the right to erasure of your personal data
- the right to object to the processing of your personal data
- the right to restrict processing of your personal data
- the right to data portability (that is, to request the transfer your personal data to you or another party), and
- the right to regulate any automated decision-making and profiling of your personal data.

The lawful basis used for processing your personal data can affect which rights are available to you. For example, where data is processed on the lawful basis of legal obligation, you do not have the right to object, the right to erasure or the right to data portability.

To exercise your rights

Data Controllers must ensure that individuals can exercise these rights where they are applicable.

If you wish to exercise any of the rights set out above, please contact us using the Contact Details provided at the end of this Privacy Notice.

You will not have to pay to access your personal data (or to exercise any of the other rights) but, if your request is manifestly unfounded, repetitive or excessive, we may charge a reasonable fee in these circumstances.

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We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

We aim to respond to all legitimate requests without undue delay and, at the latest, within one month. Occasionally, if your request is particularly complex or you have made a number of requests, it could take us longer than a month. In this case, we will notify you and keep you updated.

9. IF YOU HAVE CONCERNS

If you wish to contact Queensmead concerning data protection matters, please get in touch with our Director using the contact details provided below.

Contact details

Director
Queensmead Auto Services Ltd trading as Movement Auto Services
121 Walton Way
Aylesbury
Buckinghamshire
HP21 7JP
Telephone: 01296 393 535

E-mail: claireh@maq1.com

You can make a complaint at any time. As recommended by the Information Commissioner's Office, please contact us directly in the first instance to try to resolve the issue.

More information is available in the Company's separate Data Protection Complaints Policy, available from our Director using the contact details above.

If, after contacting Queensmead, you remain unhappy with how we have used your data, you have the right to escalate your complaint with the Information Commissioner's Office (ICO) at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://ico.org.uk>