



## **PRIVACY POLICY**

LAST UPDATED:

NOVEMBER 20<sup>TH</sup>, 2025

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# Privacy Policy

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This is the privacy policy of the group companies that trade using the name “Motia”. Motia is the trading name of three different legal entities:

- Fuel Card Services Limited – registered in England and Wales
- Cubo Solutions Ltd – registered in Northern Ireland
- Cubo Telematics & Telecoms Limited – registered in the Republic of Ireland

This privacy policy sets out:

- what information each of the Motia companies collects from you and why, and how the information is collected;
- how we use and protect any information that you give; and
- how you can access and manage your information.

This privacy policy is issued on behalf of each of the Motia companies so when we mention “Motia”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service from us.

Fuel Card Services is the controller and responsible for our websites [www.fuelcardservices.com](http://www.fuelcardservices.com) and [www.motia.com](http://www.motia.com). Cubo Solutions Ltd is the controller and responsible for our website [www.wearecubo.com](http://www.wearecubo.com).

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy policy.

We may change this policy from time to time by updating this page. We will make clear whenever any changes are made. This policy is effective from 20 November 2025.

## 1. What we collect

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

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our websites.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our websites, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our websites to help improve the websites and our service offering. Also our telematics products will generate usage data on an anonymised basis.

## 2. How is your personal data collected?

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We use different methods to collect data from and about you including through:

**Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. If you use our services and services platforms we will receive further information about you. This includes personal data you provide when you:

- use one of our recommendation tools on our websites;
- apply for our products or services;
- create an account on our websites;

- use our services provided via our online platforms;
- request one of our sales team to contact you or request marketing to be sent to you;
- enter a survey; or
- give us feedback or contact us.

**Automated technologies or interactions.** As you interact with our websites and service platforms, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

**Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

- Technical Data is collected from the following parties:
  - analytics providers such as Google Analytics based outside the UK and EEA; and
  - search information providers such as Google based outside the UK and EEA.
- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services such as PXP Financial based inside the UK.
- Identity and Contact Data is collected from data brokers or aggregators such as Red Flag based inside the UK.
- Identity and Contact Data is collected from publicly available sources such as the UK's Companies House, Ireland's Companies Registration Office and the relevant Electoral Registers based inside the UK and Ireland respectively.

### 3. What we do with the information we gather

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#### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to

prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To register you or your business or your employer as a new customer	(a) Identity (b) Contact	Performance of a contract with you  In order to provide our services and to sell products to you, we need your contact details and the details of your co-workers and employees.
To process and deliver your order including: (a) Sending fuel cards to you (b) Providing our services (such as Motia Telematics) via a platform, including providing you with analytical data (c) Manage payments, fees and charges (d) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)  In order to provide our products and services under our contract with you, we need to send you the fuel cards and provide you with data via our online platforms.  Where your payments are to be taken via direct debit, this information will be collected from you and processed directly with your bank.
Prevention of fraud	(a) Identity (b) Contact (c) Transaction	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

		(c) Necessary for our legitimate interests (to avoid us being complicit in fraudulent activities)
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Dealing with your requests, complaints and queries</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)</p>
<p>To enable you to complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business, our websites and our services platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p> <p>Online advertisements for our products and services may be provided via third parties and their websites. Your data will be collected and shared with us in accordance with those third parties' data privacy policies.</p>
<p>To use data analytics to improve our websites, products/services, service platforms, customer relationships and experiences and to measure the effectiveness of our communications and marketing</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites and service platforms updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To send you relevant marketing communications and make personalised suggestions and recommendations to you about</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR Consent, having</p>

goods or services that may be of interest to you based on your Profile Data	(c) Technical (d) Usage (e) Profile (f) Marketing and Communications	obtained your prior consent to receiving direct marketing communications
To carry out market research through your voluntary participation in surveys	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).
To consider your business or your employer as a service provided to us	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To receive goods and services from you or your employer, including: (a) Placing orders with you (b) Receiving services from you, including via your website and online applications (c) Manage payments to you	(a) Identity (b) Contact (c) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to receive goods and services, and provide goods and services to our customers)

## Direct marketing

During the registration process on our websites when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from us via email, telephone, SMS and post.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view of which products, services and offers may be of interest to you so that we can then send you relevant marketing communications. These marketing communications may provide details of third party products and services that may be of interest to you based on our analysis of the data we hold. However, as set out below, we will only share your personal data with any third parties after we get your express consent.

## Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

## Opting out of marketing

You can ask us to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us via the details below.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to order confirmations, updates to our Terms and Conditions, checking that your contact details are correct.

## Cookies

For more information about the cookies we use and how to change your cookie preferences, please see [Cookie Policy](#).

## 4. Disclosures of your personal data

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We may share your personal data where necessary with the parties set out below for the purposes set out in the table above.

- **Motia Companies** – for business operational purposes, including service enhancement, customer support, analytics, and marketing communications related to our products and services. We rely on legitimate interest as our lawful basis for this processing, as it enables us to operate efficiently and provide better services to our customers.
- **Internal Third Parties** – we are part of the DDC PLC group of companies, and your personal data may be shared within the group. Details are set out <https://www.dcc.ie/>.
- **External Third Parties** – who may provide us with goods or services as our subcontractors, who may provide you with goods or services through your relationship with us (for example LMP Legal Ltd, whose services you may access via Motia Roadside Legal) or who may assist us in complying with our legal obligations, such as credit reference agencies.
- Third parties to whom we may choose to sell, 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 policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



## 5. International transfers

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We share your personal data within the DCC PLC Group and the other Motia companies. This may involve transferring your data outside the UK to our overseas offices in the Republic of Ireland.

Whenever we transfer your personal data out of the UK or the EEA to countries which have laws that do not provide the same level of data protection as the UK law or Irish law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented:

We use specific standard contractual terms approved for use in the UK or the European Union which give the transferred personal data the same protection as it has in the UK and the European Union, namely the International Data Transfer Agreement or The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers.

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK or the EEA to countries which have laws that do not provide the same level of data protection as the UK law or Irish law.

Whenever we transfer your personal data out of the UK or the EEA to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK or the EEA to provide an adequate level of protection for personal data, such as the member states of the European Union.
- We may use specific standard contractual terms approved for use in the UK and the EEA which give the transferred personal data the same protection as it has in the UK and EEA, namely the International Data Transfer Agreement or The International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers.

## 6. Security

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The security of your information is very important to us. As part of our commitment to keeping your data safe, our technical experts maintain physical, electronic and managerial procedures to keep safe the information we collect online.

Only authorised employees and carefully checked agents, contractors and sub-contractors, who provide a particular data processing service for us, are permitted access to your data. These people will only be allowed access to your data for the purposes identified within this Privacy Policy, processing it on our behalf or for IT security and maintenance.

We aim to protect all of our customers from fraud. As part of this, we may use your personal information to verify your identity to help prevent or detect fraud. These checks may involve your information being disclosed to credit reference agencies, who may keep a record of that information.

Sometimes, you might wish to disclose sensitive information to us, we will only use sensitive data for the specific reason you disclosed it to us and we will take extra care to keep it secure. From time to time, we will check with you that we may continue to use that sensitive data for the specified purpose, you may withdraw your consent at any time.

## **7. How long we hold your information for**

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The time period for which we keep information varies according to what we use the information for. Unless there is a specific legal requirement for us to keep information, we will keep your information for as long as it is relevant and useful for the purpose for which it was collected.

You are entitled to request that we erase your personal information at any time, for example where you cease to be an active customer of ours. Whilst we will generally seek to comply with your request, there will be circumstances where we are entitled to retain such personal information (e.g. in respect of legal claims).

## **8. Controlling your personal information**

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You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see “Opting Out Of Marketing” in Section 4 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, see Contact details in section 9 below.

### **No fee usually required**

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

### **What we may need from you**

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 you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. Contact Details**

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If you want to contact us in respect of your personal data, or whether to exercise any of your rights (as set out in section 8 above) you may do so at any time by writing to us at Data Protection Enquiries, Motia, Alexandra House, Lawnswood Business Park, Redvers Close, Leeds, LS16 6QY, emailing us at [GDPR@motia.com](mailto:GDPR@motia.com) or calling us on 0113 298 1000.

If you believe that any information we are holding on you is incorrect or incomplete, please write, email or call us as soon as possible, using the details set out above. We will promptly correct any information found to be incorrect.

To protect your privacy and security, we will take reasonable steps to verify your identity before granting access or making corrections.

## **10. Complaints**

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You have the right to make a complaint at any time. If you are in the UK, you may complain to the Information Commissioner's Office ("ICO"), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) or if you are in the Republic of Ireland, you may complain to the Office for the Information Commissioner ("OIC"), the Irish regulator for data protection issues ([www.oic.ie](http://www.oic.ie)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO or the OIC, so please contact us in the first instance.

## **11. Changes to the privacy policy and your duty to inform us of changes**

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We keep our privacy policy under regular review. This version was last updated on 20 November 2025. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

## **12. Third-party links**

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Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are

not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy policy of every website you visit.