

## How do we process personal data?

The purpose of this document is to identify each of the ways in which we process our customer's personal data and the legal basis we rely on to do so. This information will be provided to customers (via our privacy policy) and will enable Inchcape to put in place the appropriate policies and procedures.

| <b>Making a vehicle enquiry or negotiating to buy a vehicle</b>  |  |   |
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| <b>Processing Activity</b>   | <b>Type of data</b>  | <b>Legal basis</b>  |
| To respond to your enquiries and to fulfil your requests - for example to send you a brochure or to provide details about a vehicle  | Contact data /<br>Audio data   | Contractual performance /<br>Legitimate interest            |
| To email you a video presentation about a vehicle you have enquired about  | Contact data   | Contractual performance /<br>Legitimate interest            |
| To follow up on a request you have made through a third party website – such as Autotrader or Car Wow – to enquire about a vehicle we have advertised  | Contact data   | Legitimate interest   |
| To arrange a test drive where we have a legal obligation to check you hold a valid driving licence and for insurance purposes and compliance with the Road Traffic Act   | Contract data /<br>Identity data   | Contractual performance /<br>Legal or regulatory obligation |
| Photographic images and footage of you is collected via the operation of CCTV when you come into our showrooms or visit our dealerships. This is for security, crime prevention and required for insurance purposes. | Image data   | Legitimate interest   |
| <b>Purchasing a vehicle</b>  |  |   |
| <b>Processing Activity</b>   | <b>Type of data</b>  | <b>Legal basis</b>  |
| Completion of all mandatory sales documentation to purchase a vehicle  | Contact data /<br>Identity data /<br>Vehicle data /<br>Transaction data /<br>Family data if applicable | Contractual performance                                     |
| Sharing your personal data with vehicle manufacturer systems to allow vehicle ordering, in car systems setup, and activation of services and products for the vehicle including warranty                             | Contact data /<br>Vehicle data /<br>Family data if applicable  | Contractual performance                                     |
| Administer the manufacturer's complimentary insurance on your behalf (if applicable)   | Contact data /<br>Family data if applicable  | Contractual performance /<br>Legal or regulatory obligation |

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| Registering and taxing the vehicle with the DVLA   | Contact data /<br>Vehicle data | Contractual performance /<br>Legal or regulatory obligation |
| To provide or manage any information, products or services you have asked for specifically related to the purchase of your | Contact data                   | Contractual performance /<br>Consent                        |

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| vehicle - for example the purchase of an asset protection policy or cosmetic repair product  |              |   |
| If you are part exchanging or selling your vehicle to our dealership we will check your vehicle details via our third party provider CAP-HPI before making an offer to buy the vehicle and may use an appraisal tool provided by BCA | Vehicle data | Contractual performance /<br>Legal or regulatory obligation |
| To send you a customer survey following your vehicle purchase to gain your feedback about our products and services provided   | Contact data | Legitimate Interest   |

### Purchasing a vehicle with Finance

| Processing Activity  | Type of data  | Legal basis   |
|--|---|---|
| To administer and arrange finance for you to purchase or lease a vehicle   | Contact data /<br>Vehicle data /<br>Identity data /<br>Financial data | Legal or regulatory obligation /<br>Legitimate interest |
| Completion of documents required to comply with the FCA guidelines when administering finance on your behalf   | Contact data /<br>Vehicle data /<br>Identity data /<br>Financial data | Legal or regulatory obligation                          |
| To enter your personal details into the finance provider's system so the finance provider can conduct a credit check and affordability assessment on you before making a decision whether to offer you finance to fund your vehicle  | Contact data /<br>Vehicle data /<br>Identity data /<br>Financial data | Contractual performance /<br>Consent                    |
| If your application for finance is declined by the finance provider, we will advise you of this before sending your personal information to another lender for consideration. We will always seek your consent before passing your application to other approved finance providers or credit brokers | Contact data /<br>Vehicle data /<br>Identity data /<br>Financial data | Consent   |
| To contact you where you may be suitable to purchase a subsequent vehicle with finance, for a contract renewal, at the end of your contract or in relation to the purchase of a new vehicle  | Contact data /<br>Vehicle data /<br>Identity data /<br>Financial data | Legitimate Interest                                     |

## Vehicle maintenance, repairs and servicing

| Processing Activity   | Type of data                                      | Legal basis   |
|---|---|---|
| To contact you to book an appointment to bring your vehicle into the dealership which falls under your service contract or service plan for your vehicle  | Contact data /<br>Vehicle data /<br>Audio data    | Contractual performance                                     |
| To register your vehicle with service plans administered by the vehicle manufacturer or a third party provider.   | Contact data /<br>Vehicle data /<br>Audio data    | Contractual performance                                     |
| To collect or deliver your vehicle outside our dealership for example to collect your vehicle from your home or work address to undertake service works on the vehicle. This service maybe outsourced to an approved third party vehicle delivery company   | Contact data /<br>Vehicle data                    | Contractual performance                                     |
| Arranging a courtesy car or loan/rental car. If we agree to provide a courtesy or loan/rental vehicle to you for the duration of the works on your vehicle then you will be asked to provide a copy of your driving licence for insurance purposes and to ensure you hold a valid driving licence. If we are going to provide a loan/rental vehicle then we will need to provide your details to the third party that will provide that vehicle. If you incur any speeding, parking or other motoring offences when using the vehicle we will forward your contact data to the third party enforcing the penalties. | Contact data /<br>Vehicle data /<br>Identity data | Contractual performance /<br>legal or regulatory obligation |
| We will contact you in relation to all on-going servicing, repairs and maintenance of your vehicle, including manufacturer warranty claims  | Contact data /<br>Vehicle data /<br>Audio data    | Contractual performance /<br>Legitimate interest            |
| Rectification works to your vehicle as part of an insurance claim. Your insurance provider may request your vehicle is repaired by one of our approved body shops and they will share your personal information with Inchcape for this purpose  | Contact data /<br>Vehicle data                    | Contractual performance /<br>Legitimate interest            |
| We may capture your vehicle registration number when you drive onto our dealership premises using ANPR to recognise you in relation to your service booking   | Contact data /<br>Vehicle data /<br>Image data    | Contractual performance /<br>Legitimate interest            |
| Breakdown assistance, your personal details are provided by the breakdown provider to Inchcape to complete the repairs  | Contact data /<br>Vehicle data                    | Contractual performance /<br>Legitimate interest            |
| We will contact you to notify you when your vehicle is due for servicing or MOT as part of our ongoing service to you. The legal responsibility for maintaining the vehicle in line with the manufacturer's guidelines is with you.   | Contact data                                      | Legitimate interest   |

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| To contact you if there is a safety or product recall notice issued by the manufacturer to arrange rectification works at our authorised dealership.  | Contact data /<br>Vehicle data | Vital interest      |
| We may contact you with other communications relating to manufacturer recommendation for maintenance of your vehicle, vehicle health checks or other similar services   | Contact data /<br>Vehicle data | Legitimate interest |
| <b>Processing necessary for us to promote our business and engage with our customers</b>  |                                |                     |
| <b>Processing Activity</b>  | <b>Type of data</b>            | <b>Legal basis</b>  |
| If you are an existing or new customer to Inchcape we will send you promotional marketing information including invitations to events in our dealerships and offers from time to time if you have purchased a product or service from us. You have the right to object to us sending you this information at any time. Please see section 11 in this privacy notice for further detail about your rights. | Contact data                   | Consent             |
| If you do not have a previous relationship with Inchcape or have never negotiated to buy a vehicle or purchased any of our products or services we will only send you marketing communications if you have opted in to receive these communications   | Contact data                   | Consent             |

|  |   |                     |
|--|---|---------------------|
| To contact you with targeted advertising delivered online through social media and other platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us. | Social Network data /<br>Website data                   | Legitimate interest |
| To identify and record when you have received, opened or engaged with our website or electronic communications   | Contact data /<br>Social Network data /<br>Website data | Legitimate interest |
| To contact you in relation to additional products and services, including those offered by third parties, that may be related to your vehicle such as asset protection and extended warranty protection plans.   | Contract data /<br>vehicle data                         | Legitimate interest |
| To administer competitions and promotions that you enter with us from time to time and to distribute prizes  | Contact data  | Consent             |

|   |                              |                     |
|---|------------------------------|---------------------|
| To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services that we think you will be interested in.   | Contact data                 | Legitimate interest |
| To work with third parties to help us with our advertising and marketing such as helping us to understand how well our advertising works, who may benefit from our, and our third party partners', products and services and also to reach people who may be interested in our, and our third party partners', products and services. | Contract data / vehicle data | Legitimate interest |
| We may take photographic images of you when you collect your new vehicle from the dealership or record video footage during dealership events with your consent to promote our business via social media channels or via our websites   | Image data                   | Consent             |

**Processing necessary for our business to operate on a daily basis and to fulfil data protection laws**

| <b>Processing Activity</b>   | <b>Type of data</b>                           | <b>Legal basis</b>                              |
|--|---|---|
| For general administration including managing your queries, complaints, or claims and liaising with our advisors and industry associations for the resolution of your complaints or claims   | Contact data                                  | Contractual performance/<br>Legitimate interest |
| Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively  | Contact data                                  | Contractual performance                         |
| For network and information security purposes i.e. in order for us to take steps to protect your personal data against loss, damage, theft or unauthorised access  | Contact data                                  | Legal or regulatory obligation                  |
| To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request) | All types of data<br>Depending on the request | Legal or regulatory obligation                  |
|  |   |   |
| To inform you of updates to our terms and conditions and policies  | Contact data                                  | Legal or regulatory Obligation                  |
| To inform you of changes to our business, for example the opening or closing of dealership sites   | Contact Data                                  | Legitimate interest                             |