

## How do we process personal data?

The purpose of this document is to identify each of the ways in which we process our customers' 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/sell a vehicle</b>   |  |  |
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| <b>Processing Activity</b>   | <b>Type of data</b>  | <b>Legal basis</b>   |
| In line with FCA guidance, we will record information indicative of potential vulnerabilities. This is to ensure that we can support you with any additional needs you may have. Click <a href="#">here</a> to read the FCA's guidance for firms on the fair treatment of vulnerable customers.  | Contact data / Identity data/ data relating to vulnerability | Legitimate interest  |
| 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 / Audio data                                    | Contractual performance / Legitimate interest              |
| To respond to your request via Sell My Car and provide you with a vehicle valuation and appointment options.   | Contact data   | Legitimate interest  |
| To email you a video presentation about a vehicle you have enquired about.   | Contact data   | Contractual performance / Legitimate interest              |
| To follow up on a request you have made through a third party website – such as Autotrader, carwow, ebay motors for example 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.  | Contact data / Identity data                                 | Contractual performance / 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, public safety, crime prevention and required for insurance purposes.<br><br>We may also, on occasion, undertake video and audio recordings of mystery shopper exercises at our sites. These recordings are made to ensure our employees are providing excellent service to customers. Whilst customers are not the intended subject of these recordings, it is possible that customer images may be captured during this process. | 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, including Motability sales and sales of VAT zero rated vehicles.  | Contact data/ identity data/                                 | Contractual performance and where health data is required, |

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|   | vehicle data/<br>financial data/<br>transaction data/<br>family data if<br>applicable/health<br>data where<br>necessary | substantial public<br>interest                                       |
| To prevent illegitimate reselling or exporting of vehicles outside of the manufacturers guidelines and to ensure we comply with Inchcape's contractual obligations.   | Contact<br>data/identity<br>data/vehicle<br>data/transaction<br>data  | Contractual<br>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<br>applicable  | Contractual<br>performance   |
| Administer the manufacturer's complimentary insurance on your behalf (if applicable).   | Contact data /<br>family data if<br>applicable  | Contractual<br>performance /<br>Legal or regulatory<br>obligation    |
| Registering and taxing the vehicle with the DVLA.   | Contact data /<br>vehicle data  | Contractual<br>performance /<br>Legal or regulatory<br>obligation    |
| If you have purchased an electric vehicle from us, and you have enquired about a home charging wallbox, we may, with your agreement, provide your details to a supplier who will undertake a survey before installing the wallbox.    | Contact data /<br>vehicle data  | Legitimate Interest  |
| To provide or manage any information, products or services you have asked for specifically related to the purchase of your vehicle - for example the purchase of an asset protection policy or cosmetic repair product.               | Contact data  | Contractual<br>performance /<br>Consent                              |
| 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<br>performance<br>/ Legal or<br>regulatory<br>obligation |
| To send you a customer survey following your vehicle purchase or work undertaken on your vehicle to gain your feedback about our products and services provided.  | Contact data  | Legitimate<br>Interest   |
| <b>Purchasing a vehicle with Finance</b>  |   |  |
| <b>Processing Activity</b>  | <b>Type of data</b>   | <b>Legal basis</b>   |
| 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<br>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<br>obligation                                    |

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| 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<br>performance /<br>Consent |
| In some cases, a lender may choose to decline your application for finance and therefore it may be necessary to submit your application to one or more further lenders in an effort to gain an alternative acceptance. Where this may be necessary, we will seek your consent first 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, service plan or lease contract for your vehicle.   | Contact data /<br>vehicle data /<br>audio data    | Contractual<br>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<br>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<br>performance  |
| We use a third party provider to video your vehicle during its service. We will then send you a link to the video via email / SMS which gives a visual inspection on the condition of the vehicle and shows any reported concerns   | Contact data /<br>vehicle data/<br>image data     | Contractual<br>performance  |
| Arranging a courtesy car. If we agree to provide a courtesy vehicle to you for the duration of the works on your vehicle 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 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<br>performance /<br>legal or regulatory<br>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<br>performance<br>/ Legitimate<br>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<br>performance<br>/ Legitimate<br>interest            |

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| If you have a lease vehicle, we will carry out service, maintenance and repairs on your vehicle using a platform provided by third parties in order to carry out and authorise the work.  | Contact data / vehicle data             | Contractual performance / 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 /vehicle data / image data | Contractual performance / Legitimate interest |
| Breakdown assistance, your personal details are provided by the breakdown provider to Inchcape to complete the repairs.   | Contact data / vehicle data             | Contractual performance / 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 and we may also contact you to confirm when a booking has been made. The legal responsibility for maintaining the vehicle in line with the manufacturer's guidelines is with you. | Contact data                            | Legitimate interest                           |
| 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 / 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 / vehicle data             | Legitimate interest                           |

### Processing necessary for us to promote our business and engage with our customers

| Processing Activity  | Type of data                     | Legal basis         |
|--|----------------------------------|---------------------|
| 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/website data | Legitimate interest |

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| To identify and record when you have received, opened or engaged with our website or electronic communications.  | Contact data / social network data /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.   | Contact data / 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             |
| If for any reason we have fallen short in our customer service delivery, our team will endeavour to put the situation right, to support with this, we have a comprehensive process for issuing goodwill gesture and redress, we use a third-party system to facilitate / issue the goodwill / redress.                                     | Contact data  | Legitimate interest |
| To undertake market analysis, focus groups 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.<br><br>Focus groups held at our sites may be subject to audio and video recording. | Contact data / opinions / image and audio data for focus groups | Legitimate interest |
| To work with third parties that help us with our advertising and marketing to help us understand how well our advertising works and to reach people who may be interested in our products and services.  | Contact data / vehicle data / social network data               | Legitimate interest |
| To engage with you via social media platforms and respond to communications and complaints   | Contact data / vehicle data / social network 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                  |

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| 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 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, closing or rebranding of dealership sites.   | Contact data                               | Legitimate interest            |