

Customer Facing Privacy  
Notice for Inchcape Retail  
explaining how Inchcape  
Retail uses your personal  
information

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## 1 **Who we are**

We are Inchcape Retail. , Inchcape Retail includes the following companies, all of which are Registered in England & Wales and have their Registered Office at First Floor, Unit 3140 Park Square, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN :-

- Inchcape Retail Limited (Company Number 194561) which is authorised and regulated by the Financial Conduct Authority;
  - Chapelgate Motors Limited (Company Number. 2841981) (an Appointed Representative of Inchcape Retail Limited);
  - Gerard Mann Limited (Company Number 660644) (an Appointed Representative of Inchcape Retail Limited); and
  - The Cooper Group Limited (Company Number 821770) (an Appointed Representative of Inchcape Retail Limited);
- We are also registered with the Information Commissioner's Officer with the following registration numbers:
    - Inchcape Retail Z5437528;
    - Chapelgate Motors Limited Z7569674;
    - Gerard Mann Limited Z5063131;and
    - The Cooper Group Limited Z6970928;

## 2 **What is Personal Information?**

Personal information is any information which we collect about you that can be used to identify you and is stored either electronically or in a usable filing system.

Personal information will include any information, such as your name, address, ip address, vehicle registration number, that is collected about you by us for any reason, whether it be in connection with a purchase, by visiting our website or by contacting us.

It also includes any personal information that we may collect about you that is in the public domain, such as information made public on social media that is available to us when you connect with us on social media.

It is our intention to provide you with as much information as possible about what we do with that personal information, so that when you provide the personal information to us, you do so with an awareness of how it will be used.

## 3 **How we collect your personal information and why**

Inchcape Retail (**we, us, our, Inchcape**) will need to collect personal information about you, and there are different ways that we might do so; this privacy notice tells you what to expect when we collect personal information:

- (a) from visitors to our website, [www.inchcape.co.uk](http://www.inchcape.co.uk);
- (b) through social media;
- (c) anyone referred to us from enquiries made of our brand partners (via their websites or otherwise) or used vehicle websites such as Auto Trader Limited or Carwow;
- (d) anyone who contacts us;
- (e) anyone who purchases a vehicle;
- (f) anyone who uses our service and maintenance services;
- (g) anyone who subscribes to our marketing.

### 3.2 Visitors to our websites

Our website is managed by Fusion Workshop Limited trading as 'Kagool'. As part of the service provided by Kagool, they will help to maintain the security and the performance of our website by (i) encrypting data in transit and protecting user connections (ii) using third party scanning services to scan against known web attacks (iii) investigating site errors using third party New Relic and (iv) providing secure hosting services through Microsoft Azure. Kagool's privacy notice can be found at [www.bekagool.com/legal-pages/website-terms-of-use](http://www.bekagool.com/legal-pages/website-terms-of-use)

#### 3.2.1 Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our website for our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our website, which allows us to provide you a better experience and also allows us to improve our website.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies. However, if you do block cookies there may be parts of our website that you will be unable to access or that will not function properly.

We use the following types of cookies:

- (a) Strictly necessary cookies.

These are cookies that are essential for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Strictly necessary cookies			
Site Region	Cookie Name	Expiry	Description
Global	recent_cars	1	Used to store cars a site visitor has

		month	recently viewed in order to present them back to the visitor on other pages.
Global	ASP.NET_SessionId	At end of visit	General purpose platform session cookie, used by sites written with Microsoft .NET based technologies. Used to maintain an anonymised user session by the server. Used by the website to serve the correct data to the site visitor.

(b) Analytical/performance cookies.

They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Analytical/performance cookies			
Site Region	Cookie Name	Expiry	Description
UK & Worldwide	SC_ANALYTICS_GLOBAL_COOKIE	10 years	Used to track site pages visited
UK & Worldwide	_dc_gtm_UA-324282-13 _dc_gtm_UA-324282-14	1 min	These cookies enables us to manage data in Doubleclick to improve reporting on campaign performance
UK & Worldwide	_ceg.s, _ceg.u, _ceir	5 years	These cookies are placed by Crazy Egg, a platform that produces heatmaps that allow us to analyse how users engage with this website
UK & Worldwide	MhVisitorID	1 Year	Cookie provided by Mediahawk - Tracks online performance from telephone calls on the

			website
UK & Worldwide	IDE	13 months	Cookie provided by Doubleclick to target advertising based on what's relevant to a user, to improve reporting on campaign performance, and to avoid showing ads the user has already seen
UK & Worldwide	_ga_id, _gid	2 years	Google Analytics cookies that allows us to recognise and count the number of visitors and to see how visitors move around our website
UK & Worldwide	tp-b2b-selected-business-unit-idm , _biz_nA, , _vwo_uuid, amplitude_idundefinedtrustpilot.com, __asc , ,	1 year	The generation of statistics regarding Trustpilot user reviews of the business.
UK & Worldwide	Uvc, dt, di2, uid, vc, loc	1 year	Part of the AddThis service which enables social sharing of content on site

(c) Functionality cookies.

These are used to recognise you when you come back to our website so that we can personalise our content for you, greet you by name and remember your preferences (for example, your region).

Functionality cookies			
Site Region	Cookie Name	Expiry	Description
UK & Worldwide]	optimizelyEndUserId	6 months	Enables personalised content and allows us to serve different versions of web pages to improve

			performance
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### 3.2.2 Third party services

Whenever you visit our website, [www.inchcape.co.uk](http://www.inchcape.co.uk), we will use a third party service, Google Analytics, to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we use this service is that it is within our legitimate interests to find out how many people visit the website and the various parts of the website, it improves the service provided to you and improves customer experience. This information helps us to find out how our website is working and how to improve it. We do not identify anyone, and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our website.

- (a) We have YouTube video content embedded on our website. YouTube controls any information that is collected by viewing their content. YouTube's privacy policy can be located at <https://www.google.co.uk/intl/en-GB/policies/privacy/>.

### 3.3 Social media

Any information you provide to us via social media (including messaging, "liking", "following" and other communications) is controlled by the social media network.

Our website contains links to our social media pages. We currently use:

- 3.3.1 Twitter, which has its own privacy notice that can be located at <https://twitter.com/en/privacy>;
- 3.3.2 Facebook, which has its own privacy notice that can be located at <https://www.facebook.com/privacy/explanation>;
- 3.3.3 LinkedIn, which has its own privacy notice that can be located at <https://www.linkedin.com/legal/privacy-policy?trk=uno-reg-guest-home-privacy-policy>;
- 3.3.4 Instagram, which has its own privacy notice that can be located at [https://help.instagram.com/519522125107875?helpref=page\\_content](https://help.instagram.com/519522125107875?helpref=page_content).

We recommend that you read their privacy notices and contact them directly if you have any concerns regarding their use of your personal information.

### 3.4 Contacting us

Our website provides you with different ways to contact us. All communications are handled, reviewed and responded to internally by us.

Calls made to our dedicated contact centres will be recorded. It is within our legitimate interests to record such calls for training, monitoring and quality purposes. The call recording system, 'Genesys', is operated by Redcentric Limited and the data is stored and hosted on Inchcape UK's own servers in the UK. Call data will be retained for up to 1 year before being deleted. Advisors are also videoed making the customer bookings via the Genesys system. The videos are retained on the same server for 62 days before being deleted.

Please note, however, that email monitoring or blocking software may also be used and that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

As part of communicating with us, you will also submit personal information about you that we require in our legitimate interest. This includes your name, address and additional contact details.

Any personal information that is provided in and during communications is used only for the purpose of reviewing the communications and conducting the ongoing administration and management of communications. We will not use your personal information in an identifiable manner in any publication without your further explicit consent.

We will delete this personal data when we reasonably consider that we no longer need it for this purpose.

Please note that we may need to contact you about the application through any of post, email or telephone. Please can you make sure that you keep us updated of any changes to your contact details.

### **3.5 Personal information collected when you purchase a vehicle**

When you purchase a vehicle, we will need to collect information from you relating to your purchase. This varies depending on whether you are purchasing the car with or without finance.

When collecting personal information from you relating to a purchase (either with or without finance) at one of our retail centers, we will either complete a hard copy order form or an electronic order form on an iPad terminal at the center you visit. If you complete a hard copy sales form, one of our personnel will manually input the information manually in to our electronic system within 24 hours and destroy the hard copy form.

We may also hold personal information related to your purchase in a hard copy file in a secure physical filing system, at the center that you attended when you made your purchase or at a secure document archiving facility.

All electronic and hard copy files, relating solely to purchase information, will be destroyed after 7 years. If you opt in to receive marketing materials, your contact details will be retained unless and until you opt out of receiving such communications. More details about withdrawing your consent can be found [here](#).

#### Without Finance

This personal information includes the purchaser's name, address, vehicle registration number and payment details, which are a contractual necessity without which we cannot proceed with your purchase. If you are purchasing on behalf of a business but are not the business owner we will also collect this information about the owner. We will also collect your name, address (if different from the purchaser's), contact details, email, business name (if applicable) and the number of vehicles, operating locations and employees. It is in our legitimate interests to collect this additional information in order to manage and administer your purchase and our relationship with you; for example, we may call you to let you know that your vehicle is ready to be delivered and therefore deliver to the appropriate operating location.

#### With Finance

This personal information includes the purchaser's name, address, vehicle registration number, salary details, employment history and payment details, which are a contractual necessity without which we cannot proceed with your

purchase. If you are purchasing on behalf of a business but are not the business owner we will also collect this information about the owner. We will also collect your name (if applicable) and the number of vehicles, operating locations and employees. It is in our legitimate interests to collect this additional information in order to manage and administer your purchase and our relationship with you; for example, we may call you to let you know that your vehicle is ready to be delivered and therefore deliver to the appropriate operating location.

We process information relating to your finance application on behalf of Inchcape UK's finance providers, who are acting as a data controller. Please refer to Section 4 below for further details of our finance providers.

### **3.6 Vehicle service, maintenance and repair**

You may also visit us to have your vehicle serviced, maintained or repaired, and we will process your personal data when you do.

We will collect your and (if different) the vehicle owner's name and address, the vehicle registration number and your payment details as a contractual necessity in order to provide you with a service. If you do not provide these details, we will not be able to provide you with our services.

We will also collect your contact details, identifiers issued by public bodies (e.g. Driving License Number), email address, the business name (if applicable), number of vehicles, your operating locations and number of employees. If you are not the business owner, we will also collect the name and contact details of the business owner, and it will be your responsibility to ensure that such person is provided with a copy of this notice. It is in our legitimate interests to collect this information in order to tailor the service we provide; for example, to call you to give you an update on the progress of the service or on the arrival of an ordered part.

### **3.7 Subscribing to our marketing**

If you are a customer, or have made an enquiry into our products or services, we will provide you with a clear choice to consent to receiving marketing promotional material, updates, reminders and communications by giving you an opt-in to receiving such communications. If you have provided your consent we will collect your contact details (name, postal address and email address) and vehicle details (make and model) to provide you with such communications. **You have the right to withdraw your consent at any time. For full details on how to withdraw consent please see [below](#).**

We will either collect your personal information, in a hard copy form or an electronic form at one of our iPad points or over the telephone or via our website. If we use a hard copy form, one of our personnel will within 24 hours manually input the information into our electronic system and destroy the hard copy. All electronic files are stored on our Dealer Management System, Autoline. The Autoline system is provided, maintained and hosted by CDK Global (UK) Limited in the United Kingdom. We also store customer data in our showroom system, IA Live. The IA Live system is provided, maintained and hosted by Inchcape Retail in the United Kingdom. In respect of our Jaguar Land Rover brand, we store customer data in a system called enquiryMAX. The enquiryMAX system is provided, maintained and hosted by enquiryMAX Limited on behalf of Jaguar Land Rover. enquiryMAX Limited and CDK are providers of industry standard software solutions and a copy of their privacy notices can be found at <http://www.cdkglobal.co.uk/privacy-policy> and <http://www.enquirymax.com/privacy/>.

We use third parties, Emailcenter UK Limited, Northend Print Solutions Limited, Webmart Limited, and Marks Fitzpatrick Gaule Limited to manage our newsletter subscriptions.

**If you ever decide you no longer wish to receive our marketing communications, you opt out at any time by unsubscribing from the mailing list, using the link provided in the marketing communications email, or by using the contact details below. If you do unsubscribe, please note that we will still keep your details in our system marked as 'denied' so that we can make sure that you do not receive our marketing communications again in the future.**

#### **4 Your data and third parties**

We do use third parties to provide services to us from time to time; therefore, we will need to share data with them that it is in our legitimate interests for business administrative needs. A list of third parties that we use and how they process personal information is set out in the table below. Part I of the table refers to such third parties that are located within the EEA. Part II of the table refers to such third parties that are located outside of the EEA and sets out what additional safeguards we have in place to protect your personal information when transferring personal information outside of the EEA.

<b><u>Part I</u></b>			
<b><u>Third Party</u></b>	<b><u>What Data</u></b>	<b><u>Why do we share this data</u></b>	<b><u>How long is this data kept by this third party</u></b>
<b><u>Brand Partners</u></b>			
Volkswagen UK	Name, address, email address, phone number, vehicle and all vehicle purchase and services purchase details	Sales, aftercare / aftersales, insurance of warranty cover, marketing, customer relationship management, vehicle safety	For information on how Volkswagen use your personal data please refer to their privacy notice at: <a href="http://www.volkswagen.co.uk/privacy">http://www.volkswagen.co.uk/privacy</a>
Audi UK	Name, address, email address, phone number, vehicle and all vehicle purchase and services purchase details	Sales, aftercare / aftersales, insurance of warranty cover, marketing, customer relationship management, vehicle safety	For information on how Audi UK use your personal data please contact them at <a href="https://www.audi.co.uk/about-audi/contact-us.html">https://www.audi.co.uk/about-audi/contact-us.html</a>
Mercedes Benz	Name, address, email address, phone number, vehicle and all vehicle purchase and services purchase details	Sales, aftercare / aftersales, insurance of warranty cover, marketing, customer relationship management, vehicle safety	For information on how Mercedes-Benz use your personal data please refer to their privacy notice at: <a href="https://www.daimler.com/privacy/">https://www.daimler.com/privacy/</a>
Toyota GB PLC (for	Name, address, email address, phone	Sales, aftercare / aftersales, insurance	For information on how Toyota GB use your

Toyota and Lexus)	number, vehicle and all vehicle purchase and services purchase details	of warranty cover, marketing, customer relationship management, vehicle safety	personal data please refer to their privacy notice at: <a href="https://www.toyota.co.uk/footer/privacy-policy.json">https://www.toyota.co.uk/footer/privacy-policy.json</a>
Jaguar Land Rover Limited	Name, address, email address, phone number, vehicle and all vehicle purchase and services purchase details	Sales, aftercare / aftersales, insurance of warranty cover, marketing, customer relationship management, vehicle safety	For information on how Jaguar Land Rover Limited use your personal data please refer to their privacy notice at: <a href="https://www.landrover.co.uk/privacy-policy/index.html">https://www.landrover.co.uk/privacy-policy/index.html</a>
BMW UK	Name, address, email address, phone number, vehicle and all vehicle purchase and services purchase details	Sales, aftercare / aftersales, insurance of warranty cover, marketing, customer relationship management, vehicle safety	For information on how BMW UK Limited use your personal data please refer to their privacy notice at: <a href="https://www.bmw.co.uk/global/privacy-policy">https://www.bmw.co.uk/global/privacy-policy</a>
<u>Consultants</u>			
Third party consultants of Inchcape UK	Name, address, email address, all vehicle purchase and services purchase details	Consultancy services on all areas of Inchcape UK's business	Data is not retained by consultants
Third Party Software			
DMS Autoline	Name, address, email address, phone number	Aftersales and Aftercare	Archived every 28 days. Archived data kept for 1000 days. Accounts information is deleted from the system on a monthly basis once the most recent transaction data has been archived for 1000 days.  Archived data is retained for 7 years
enquiryMAX Limited (software used by Jaguar Land Rover)	Name, address, email address, phone number, all vehicle purchase and services purchase details	Sales, aftercare / aftersales, insurance of warranty cover, marketing, customer relationship management, vehicle safety,	For information on how enquiryMAX Limited will use your personal data please refer to their privacy notice at: <a href="http://www.enquiryma">http://www.enquiryma</a>

		marketing, customer care	<a href="#">x.com/privacy/</a>
RTC Computer System	Name, Address, Email address, phone number	Aftercare, marketing	2 years
Maxemail System provided by Emailcentre	Name, Email address, Mobile Number, Vehicle Data, Service and MOT Dates	Generate Service and MOT reminders, Marketing Communications  Marketing	Indefinitely, unless a deletion report is run.
Kagool Limited	Name, address, telephone numbers, email address, servicing information, vehicle information	Website management, customer enquiry management and delivery, MyGarage customer account, online booking management, optional surveys	Where customer registers for "My Garage" their email address and any personal information such as telephone number, address and email address is stored in the database indefinitely.
The Network Collective	Telephone numbers but with no identifying data	Telephone expense management and telecomms networks advisors	No storage process only
Lex Autolease Supply Trak – electronic purchasing system	Company/employer  Delivery Destination  Driver Name / Phone number	To book delivery with agent	For information on how Lex Autolease will use your personal data please refer to their privacy policy at: <a href="https://www.lexautolease.co.uk/business/privacy">https://www.lexautolease.co.uk/business/privacy</a>
Ebbon Dacs – electronic purchasing system	Company/employer  Delivery Destination  Driver/Fleet Manager Name  Driver/Fleet Manager Phone number  Driver/Fleet manager email address	To book delivery with agent	For information on how Ebbon Dacs use your personal data please contact them at: <a href="http://www.ebbon-dacs.com/contact-us/">http://www.ebbon-dacs.com/contact-us/</a>
Epyx Onelink – electronic purchasing	Company/employer  Delivery Destination	To book delivery with agent	For information on how Epyx will use your personal data please

system	Driver/Fleet Manager Name  Driver/Fleet Manager Phone number  Driver/Fleet manager email address		refer to their privacy policy at: <a href="http://www.epyx.co.uk/">http://www.epyx.co.uk/</a>
Genesys – Dimension Data	Name, address, email address, phone number, vehicle purchase information	Telephony services	62 days for video recordings and 1 year for call recordings
iDEALFILE – Motor Documents Solutions Limited	Name, address, email address, phone number, vehicle purchase information	Sales data	Motor Documents Solutions Limited will comply with our instructions on destruction of personal data in line with the purpose it is used for as set out in this privacy notice
Autoflow	Name, address, email address, phone number, vehicle data, insurance information (where applicable)	Aftercare / Aftersales	At least 2 years
<u>Claims and Accident Management Companies</u>			
Auxillis	Name, Email address, VRN, driving licence number, any driving licence penalties / speeding fines, IP address, age (and DOB), home address, Phone Numbers, Voice recordings (Data subject voice), gender	Accident Management	Records in the claims system (Proclaim) are archived 3 years after case closure into an offline copy of the system that is not accessible by operational staff.  After 7 years, the records are permanently and securely destroyed.
<u>Third Party Repairers</u>			
Inchcape Retail's authorised third party body repair providers	Name, address, email address, telephone number, vehicle data and insurance information (where applicable)	After sales and Aftercare	Further details can be provided upon request.

<u>Marketing Agencies</u>			
Emailcenter UK Limited	Name, address, email address, phone number, date of birth, age, sex, vehicle details, retail centre visited	Marketing	Deleted Once Used
GoldSand Digital Limited	Email address	Magazine distribution	Deleted Once Used
Porsche (Partner PCMS)	Name, address, email address	Marketing	Deleted Once Used
Rhino Design Limited	Name, address, email address, phone number	Used on an Adhoc basis for Sale Event Marketing	28 days
NJ Northend Limited	Name, address, phone number, email address	Used for Adhoc Marketing Campaigns, Customer letters – print only	3 months
Webmart Limited	Name, address, phone number, date of birth, age, sex	Used for Adhoc Marketing Campaigns, Customer letters – print only	Deleted Once Used
Interactive Marketing (UK) Limited	Name, address, phone number, email address	Lost sales telephone calling services	Live for 42 days then archived for a further 140 days before being shredded
Uni-mail Ltd	Name, address, Vehicle Data, Service and MOT Dates	Generate Postcard Service and MOT reminders for Toyota and Lexus	Deleted Once Used
Marks Fitzpatrick Gaule Limited	Name, address, email address, phone number, vehicle data	Phone Prospecting to support sales events	Deleted once used
Paragon Group Limited	Name, address, vehicle details	Marketing	4 weeks

Dentsu Aegis / IProspect	Name, address, vehicle details, email address, telephone number – all hashed and anonymised	Marketing	Dentsu Aegis/IProspect will comply with our instructions on destruction of personal data in line with the purpose it is used for as set out in this privacy notice
Mediahawk Limited	Information about visitors activity on the website including their IP address and their telephone number when they call the company. Call recordings are stored for Porsche customers.	Marketing analytics	For a maximum of 5 years. Call recordings 30 days (plus up to 60 days archived).
Reputation.com (UK) Limited	Name, email address, vehicle information	Customer feedback services	During term of contract with Inchcape UK
Chameleon Contact Specialists Limited	Name, address, email address, phone number, vehicle data	Phone Prospecting to support sales events	12 months
<u>Finance Providers</u>			
Black Horse Limited (trading as Black Horse Motor Finance)	Name, title, address, email address, phone number, date of birth, age, sex, identifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.	Sales, finance, insurance or warranty cover	For information on how Black Horse Limited use your personal data please refer to their privacy notice at: <a href="https://www.blackhorse.co.uk/privacy">https://www.blackhorse.co.uk/privacy</a>
Volkswagen Financial Services (UK)	Name, title, address, email address, phone number, date of birth,	Sales, finance, insurance or	For information on how Volkswagen Financial Services (UK) Limited

<p>Limited (trading as Volkswagen Finance, Audi Financial Services, Volkswagen Commercial Vehicle Finance, Porsche Financial Services)</p>	<p>age, sex, identifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.</p>	<p>warranty cover</p>	<p>use your personal data please refer to their privacy notice at: <a href="http://www.vwfs.co.uk/en/home/privacy-policy.html">http://www.vwfs.co.uk/en/home/privacy-policy.html</a></p>
<p>Toyota Financial Services (UK) PLC</p>	<p>Name, title, address, email address, phone number, date of birth, age, sex, identifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.</p>	<p>Sales, finance, insurance or warranty cover</p>	<p>For information on how Toyota Financial Services (UK) PLC use your personal data please refer to their privacy notice at: <a href="https://www.lexusfinancial.com/us/en/online-policies-and-agreements.html#opp">https://www.lexusfinancial.com/us/en/online-policies-and-agreements.html#opp</a></p>
<p>Lexus Financial Services (UK) PLC</p>	<p>Name, title, address, email address, phone number, date of birth, age, sex, identifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately</p>	<p>Sales, finance, insurance or warranty cover</p>	<p>For information on how Lexus Financial Services (UK) PLC use your personal data please refer to their privacy notice at: <a href="https://www.lexusfinancial.com/us/en/online-policies-and-agreements.html#opp">https://www.lexusfinancial.com/us/en/online-policies-and-agreements.html#opp</a></p>

	owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.		
BMW Financial Services (GB) Limited (trading as BMW Financial Services, Mini Financial Services, ALPHERA Financial Services)	Name, title, address, email address, phone number, date of birth, age, sex, identifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.	Sales, finance, insurance or warranty cover	For information on how BMW Financial Services (GB) Limited use your personal data please refer to their privacy notice at: <a href="https://myfinance.bmw.co.uk/en_GB/legal/privacy.html">https://myfinance.bmw.co.uk/en_GB/legal/privacy.html</a>
Jaguar and Land Rover Financial Services Limited	Name, title, address, email address, phone number, date of birth, age, sex, identifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.	Sales, finance, insurance or warranty cover	For information on how Jaguar Land Rover Financial Services Limited use your personal data please refer to their privacy notice at: <a href="https://www.landrover.co.uk/offers-and-finance/further-information.html">https://www.landrover.co.uk/offers-and-finance/further-information.html</a>

Mercedes-Benz Financial Services UK Limited	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.	Sales, finance, insurance or warranty cover	For information on how Mercedes-Benz Financial Services UK Limited use your personal data please refer to their privacy notice at: <a href="https://www.mercedes-benz.co.uk/passenger-cars/buy/finance/existing-finance-customers.module.html#">https://www.mercedes-benz.co.uk/passenger-cars/buy/finance/existing-finance-customers.module.html#</a>
Santander Consumer (UK) PLC	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.	Sales, finance, insurance or warranty cover	For information on how Santander Consumer (UK) PLC use your personal data please refer to their privacy notice at: <a href="https://www.santanderconsumer.co.uk/your-data/privacy-policy/">https://www.santanderconsumer.co.uk/your-data/privacy-policy/</a>
DSG Financial Services Limited	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital	Sales, finance, insurance or warranty cover	For information on how DSG Financial Services Limited use your personal data please refer to their privacy notice at: <a href="http://www.dsafs.com/documents/DSG%20Financial%20Services%20L">http://www.dsafs.com/documents/DSG%20Financial%20Services%20L</a>

	history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.		<a href="#">td%20-%20Privacy%20Policy.pdf</a>
Evolution Funding Limited	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.	Sales, finance, insurance or warranty cover	For information on how Evolution Funding Limited use your personal data please refer to their privacy notice at: <a href="https://web.evolutionfunding.com/privacy-policy/">https://web.evolutionfunding.com/privacy-policy/</a>
Startline Motor Finance Limited	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details,	Sales, finance, insurance or warranty cover	For information on how Startline Motor Finance Limited use your personal data please refer to their privacy notice at: <a href="https://startlinemotorfinance.com/privacy-cookie-policy/">https://startlinemotorfinance.com/privacy-cookie-policy/</a>

	income, payments, loans or grants, insurance.		
Secure Trust Bank PLC (trading as Moneyway)	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.	Sales, finance, insurance or warranty cover	For information on how Secure Trust Bank PLC Limited use your personal data please refer to their privacy notice at: <a href="https://www.securetrustbank.com/privacy-statement">https://www.securetrustbank.com/privacy-statement</a>
Blue Motor Finance Limited	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.	Sales, finance, insurance or warranty cover	For information on how Blue Motor Finance Limited use your personal data please refer to their privacy notice at: <a href="https://bluemotorfinance.co.uk/home/privacy_policy">https://bluemotorfinance.co.uk/home/privacy_policy</a>
N.I.I.B Group Limited (trading as Northridge Finance)	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social	Sales, finance, insurance or warranty cover	For information on how N.I.I.B Group Limited use your personal data please refer to their privacy notice at: <a href="https://www.northridge">https://www.northridge</a>

	Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents), employment and career history, employment termination details, income, payments, loans or grants, insurance.		<a href="http://finance.com/privacy-policy/">finance.com/privacy-policy/</a>
DCML Insurance	Name, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number)	Aftercare / aftersales	6 years
<u>Insurance Administrators</u>			
Car Care Plan	Name, address, email address, phone number, date of birth, age, sex, marital status / history	Sales, aftercare / aftersales, insurance	Refer to Car Care's privacy notice at: <a href="http://www.view-privacy-policy.co.uk">www.view-privacy-policy.co.uk</a>
<u>Miscellaneous Third Parties</u>			
British Car Auctions	For auction customers: vehicle details only. For logistics customers: data in relation to collection/delivery and also the inspection if applicable. This includes, but is not limited to, the vehicle registration details, the name and address of the collection point, the name and address of the delivery point, and any other contact details which would assist in	Auction services, remarketing services, vehicle logistics, inspection and collection	7 years

	completing the job at hand.		
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<b>Part II</b>				
<b><u>Third Party</u></b>	<b><u>What Data</u></b>	<b><u>Why do we share this data</u></b>	<b><u>How long is this data kept by this third party</u></b>	<b><u>Safeguards regarding transfer of data outside the EEA</u></b>
Surveymonkey Inc (Wufoo)	Name, address, email address, telephone number	Wufoo provides online form building software services	Refer to third party's privacy notice at: <a href="https://www.wufoo.com/2018/04/05/wufoo-and-gdpr-well-compliant-with-the-new-european-data-protection-rules/">https://www.wufoo.com/2018/04/05/wufoo-and-gdpr-well-compliant-with-the-new-european-data-protection-rules/</a>	The company group is registered under the Privacy Shield.

## **5 Disclosure of personal information**

We will not usually disclose your personal information other than as already explained in [Section 2](#) and 3 above. However, there may be circumstances where we need to share personal information other than as anticipated in [Section 2 and 3](#) above. These include:

- 5.1.1 where we are legally required to disclose the information. This includes sharing the personal information with tax authorities and law enforcement agencies for the purposes of the prevention and detection of crime;
- 5.1.2 where we need to disclose the personal information for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;
- 5.1.3 disclosure is required to protect the our interests, or someone else's interests (for example, to prevent fraud);
- 5.1.4 disclosure is necessary to protect your vital interests (for example if you are unwell at our premises, we may need to seek medical assistance);
- 5.1.5 it is to a third party for the purposes of providing administrative or processing services on our behalf. If such disclosure is required we will take steps to ensure that the third party protects the personal information in the same way that we do and notify you of any changes to this privacy notice; and
- 5.1.6 to any prospective purchaser of our business assets or organisation.

## **6 Keeping personal information secure**

We know that you provide your personal information in good faith and expect it to be looked after. This is why we take the security of your personal information seriously. This means that we have taken steps internally in order to ensure that our systems adequately protect your personal information. This includes:

- (a) keeping special categories of data in a separate password protected file to all other personal information;
- (b) locating all personal information that we control on internal servers located in the United Kingdom;
- (c) ensuring strict access controls on a need to know basis; and
- (d) monitoring access to the personal information.

## **7 Your rights**

You have rights in respect of your personal information and this Section explains a bit more about those rights that are applicable to what we do with your personal information and when you can exercise them. If you would like more information about any of your rights, please contact us on the details set out [below](#).

### **7.1 Withdrawing consent**

Where you have explicitly consented to us processing special categories of data, you can withdraw consent to our processing the special categories of data at any time during the application process. If you wish to withdraw consent, please do so by sending your request in writing to our contact details [below](#).

### **7.2 Accessing your personal information**

We want you to fully understand and be comfortable with how we use your personal information. You can contact us at any time to ask whether we process any personal information about you. If we do hold or use your personal information in any way, you have the right to access that personal information. All we ask is that:

- 7.2.1 you make your request to access in writing to the contact details [below](#);
- 7.2.2 you verify your identity; and
- 7.2.3 you are fair and reasonable with how often you make this kind of request (otherwise we may be entitled to charge a fee for handling excessive requests).

Please allow us up to one month from receipt of your request in order to provide a response.

### **7.3 Requesting more information**

We hope that you can understand that it is very difficult to cover all the possible ways in which we collect and use personal information. We have tried to be as clear and as open as we can and will continue to update this privacy notice as our use of personal information develops. However, if you have any questions regarding our use of your personal information, we will be happy to give you peace of mind by answering any questions or providing any additional information that we can. If you do have any specific questions, or need anything explaining, please get in touch on the contact details [below](#).

## 7.4 Additional rights

You also have some additional rights that you may exercise as set out here. We may publish a policy, from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will provide a link to it here. In each instance we may ask you to make your request in writing to the contact addresses [below](#) and provide verification of your identity.

- 7.4.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address)
- 7.4.2 You have the right to request that we erase your personal information. Please be aware that we can only comply with such a request if
  - (a) your personal information is no longer required for the purposes it was collected for (for example, we need your personal information to respond to a communication);
  - (b) the collection, storage or use of the personal information by us is prevented by law;
  - (c) your personal information is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings.
- 7.4.3 You have the right to request that we restrict or refrain from processing your personal information:
  - (a) for the time it takes us to verify the accuracy of your personal information where you have disputed its accuracy;
  - (b) where the collection, storage or use of the personal information by us is unlawful but you decide not to ask for erasure;
  - (c) where, we no longer need your personal information but you need them for the purposes of establishing, exercising or defending a legal claim;
  - (d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal information, where you have exercised your right to object to processing.
- 7.4.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.
- 7.4.5 You have the right to object to our use of your personal information:
  - (a) where we are using that information based on our legitimate interests, and where we do not have compelling overriding grounds to continue to use your personal information; or
  - (b) at any time, where we use your personal information to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose, but may use it for another lawful purpose.

## **8 Complaints**

You are important to us, and so is protecting your personal information. We have high standards when it comes to collecting and using personal information. For this reason, we take any complaints we receive from you about our use of your personal information very seriously and request that you bring any issues to our attention.

Where you are communicating with us for the purpose of making a complaint, we will only use your personal information to handle, investigate and respond to the complaint and to check on the level of service we provide. Where the complaint is about a member of our team, we may have to disclose your identity to whoever the complaint is about. You may let us know that you don't want information that identifies you to be disclosed and we will try to respect your request; however, it may not be always possible to handle a complaint on an anonymous basis.

If you are unhappy, you can also contact the Information Commissioner's office to make a complaint directly.

## **9 Updating this privacy notice**

We keep our privacy notice under regular review in order to ensure that it properly reflects our use of personal information. This privacy notice was last updated on 30 March 2018.

## **10 How to contact us**

You can contact us by:

- 10.1 Post:** First Floor, Unit 3140 Park Square, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN
- 10.2 Email:** data.protection@inchcape.com
- 10.3 Telephone:** 0845 125 5900