

## **Avalon Motor Company Limited Privacy Policy**

### **Version 1 May 2018**

- 1. General intro**
- 2. Avalon Motor Company Limited is a Data Processor & a Data Controller**

We are data controllers for the data we hold in our own right, such as for our customer's personal information when buying a vehicle, and for proposal data gathered by us in the course of submitting a finance proposal to a finance company.

We are data processors for the data we hold as controller and for data we process for other parties, such as when a finance company asks us to obtain additional information in respect of a finance proposal.

- Avalon Motor Company Limited Information Commissioners Office registration number: ZA282338

1.1. We are committed to ensuring that we manage your personal data professionally and in compliance with all applicable data protection laws. Part of this commitment is to ensure that there is transparency about how we process personal data. This policy includes an explanation of:

- 1.1.1. What data we are processing;
- 1.1.2. Why we are processing it and what we do with it;
- 1.1.3. Whether we will share it with anyone else;
- 1.1.4. Whether we will transfer it outside of the United Kingdom;
- 1.1.5. How we keep your data safe; and
- 1.1.6. Your rights.

**1.1.7. Our lawful reason for processing our customers personal data:**

*"The data subject has given consent to the processing of his or her personal data for one or more specific purpose"*

**1.1.8. The Personal data we hold shall be:**

- (a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- (d) accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed in accordance with Article 89 (1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

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1.2. We hope that you find this Privacy Policy helpful. If you have any questions, please don't hesitate to contact us.

## **2.About us**

2.1.Our company name is AVALON MOTOR COMPANY LIMITED and our registered office is at Avalon Trading Estate, Wells Road, Glastonbury, Somerset, BA6 9AG. In this policy we have referred to AVALON MOTOR COMPANY LIMITED as: we, us, our or Avalon.

2.2. Avalon is a multi-franchised car and commercial vehicle retailer operating in the south west of England.

2.3.For any queries concerning your data please contact Matthew Ruddle (DPO) at the above address or by email at 'matt.ruddle@avaloncitroen.co.uk' or by 'phone on 01458 835000.

## **3.Your personal data**

3.1. We process your personal data if we understand that you may be interested in purchasing our products or services. In this section 3 we provide more detailed information about how we will manage your personal data.

3.2.What data do we hold about you and how have we obtained this?

3.2.1.We will obtain information about you when you enquire about our products or services. Typically, the information that we obtain will be your contact details and payment information. If you choose to buy finance or insurance products from us or from companies that partner with us, we will need more detailed information including, in some cases, identity and personal financial information.

3.2.2.If you have visited our website we may automatically collect some personal information including: details of your browser and operating system, the website from which you visit our website, the pages that you visit on our website, the date of your visit, and the Internet protocol (IP) address assigned to you by your internet service. We collect some of this information using cookies – please see Cookies in section 5 for further information. We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.

3.2.3. Our telephone calls may be recorded for training purposes and could be used to verify any comments that were made during any conversation.

3.2.4. If you use our web chat function, we will keep a record of our communications.

3.3. How do we use your personal data and what is the applicable lawful basis?

3.3.1. Where you have consented, we:

3.3.1.1. May provide you with marketing information about our products and services or the products and services of our selected partners;

3.3.1.2. We will keep you informed of events that we think will be of interest to you;

3.3.1.3. We will use your interaction with our website and with our chat function to identify which products and services will be the most relevant to you and deliver targeted and relevant messages to you

3.3.2. Where we are required to do so to perform our contract with you, we may process your information for completing warranty work or other after-sales obligations.

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3.3.3. Where it is in your vital interests, we may use your information to organise and notify you about safety and product recall notices.

3.3.4. We may process your information to comply with legal obligations including assisting HMRC, the Police and the Driver and Vehicle Licensing Agency

3.3.5. We may process your information to allow us to pursue our legitimate interests including for:

3.3.5.1. analysing our performance to further improve our customer services;

3.3.5.2. market research, training and to administer our websites;

3.3.5.3. the prevention of fraud or other criminal acts;

3.3.5.4. undertaking credit checks for finance;

3.3.5.5. complying with requests from you including if you exercise any of your rights noted in this Privacy Policy;

3.3.5.6. the purpose of corporate restructure or reorganisation or sale of our business or assets;

3.3.5.7. enforcing our legal rights or to defend legal proceedings and for general administration purposes.

3.4. Will we share your personal data with any third parties?

3.4.1. We may share your data with the manufacturer of the vehicle(s) that you have expressed an interest.

3.4.2. We may disclose your information to our third-party service providers for the purposes of providing services to us or directly to you on our behalf e.g. advertising agencies or administrative service providers. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

3.4.3. If we sell all or part of our business to a third party, we may transfer your information to that party to ensure that it can continue to provide information that you have requested or for any of the other purposes that we have noted above.

3.4.4. We may transfer your data to government or other official bodies for the purposes of complying with legal obligations, for enforcing our rights, or for the prevention or detection of a crime.

### **3.5. How long do we keep your data and where is it stored**

3.5.1.1. If you have expressed an interest in buying products or services from us or from our selected partners, we will retain your contact details and related information concerning your enquiry for 5 years from the date that we last had contact with you.

3.5.1.2. If you have purchased goods or services from us or from our selected partners, we will keep the data relating to that purchase (e.g. order forms and invoices and related correspondence) for 6 years from the date of the contract.

3.5.1.3. Records of any discussions through our web chat facility will be kept for no longer than 5 years.

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3.5.1.4.If you have requested that we do not send you marketing information we will always retain sufficient information to ensure that we remember to comply with your request.

3.5.1.5.The periods stated in this section 3.5 may be extended if we are required by law to keep your data for a longer period.

3.5.1.6. The data we hold is stored on our onsite servers. These servers are backed up via a secure cloud based solution.

## **4. Transferring your data outside of the United Kingdom ('UK')**

4.1.1.The information that you send to us may be transferred to countries outside of the UK. By way of example, this may if any of our servers or those of our third-party service providers are from time to time located in a country outside of the UK. These countries may not have similar data protection laws to the UK.

4.1.2. If we transfer your information outside of the UK in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected. These measures include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us if you would like more information about the protections that we put in place.

4.1.3. If you use our services whilst you are outside the UK, your information may be transferred outside the UK to provide you with those services.

## **5. Cookies**

5.1. We use Cookies on our website. A cookie is a small text file which is placed onto your computer (or other electronic device) when you visit our website. This enables us to monitor how many times you visit the website, which pages you view, traffic data, location data and the originating domain name of your internet service provider.

5.2. You can set your browser not to accept cookies, however some of our website features may not function as a result.

5.3. For more information about cookies generally and how to disable them you can visit:  
[www.allaboutcookies.org](http://www.allaboutcookies.org).

## **6. Data security**

6.1. We have adopted appropriate technical and organisational measures to protect the personal data we collect and use having regard to the state of the art, the nature of the data stored and the risks to which the data is exposed to human action or the physical or natural environment. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database.

6.2. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access

## **7. Links to other websites**

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7.1. Our website may contain links to and from other websites (e.g. social media sites such as Twitter, Flickr, YouTube and Facebook). Unless we own such websites, we accept no responsibility for the way in which they process your personal data. You are recommended to check the privacy policy of each website before you submit any personal data to it.

**8. Your rights**

8.1. Your right to access data

8.1.1. We always aim to be as open as we can and allow people access to their personal information. Where we hold your personal data, you can make a 'subject access request' to us and we will provide you with:

8.1.1.1. a description of it;

8.1.1.2. an explanation of why we are holding it;

8.1.1.3. information about who it could be disclosed to; and

8.1.1.4. a copy of the information in an intelligible form – unless an exception to the disclosure requirements is applicable.

8.1.2. If you would like to make a 'subject access request' please make it in writing to our contact email address noted in section 2.3 and mark it clearly as 'Subject Access Request'.

8.1.3. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

8.1.4. Unless you agree a different time, we will complete your subject access request within one month.

**8.2. Right to stop marketing messages**

8.2.1. You always have the right to stop marketing messages. We will usually include an unsubscribe button in any marketing emails. If you do wish to unsubscribe, please just click the unsubscribe button and we will promptly action that request. Alternatively, you can update your marketing preferences by contacting us at any-time. Our contact details are shown in section 2.

**8.3. Right to be forgotten**

8.3.1. If we hold personal data about you, but it is no longer necessary for the purposes that it was collected and cannot otherwise be justified – you have the right to request that we delete the data.

**8.4. Right to restrict data**

8.4.1. If we hold personal data about you and you believe it is inaccurate you have the right to request us to restrict the data until it is verified. You also have the right to request that the data is restricted where you have a right to it being deleted but would prefer that it is restricted.

**8.5. Transferring your personal data**

8.5.1. Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under section 3 How we use your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file.

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8.5.2.You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information

**8.6.Right to complain**

8.6.1.You always have the right to complain to the personal data regulator, the Information Commissioners Office ICO. You may also be entitled to seek compensation if there has been a breach of data protection laws.

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