

## PRIVACY POLICY

### CONTEXT AND OVERVIEW

#### KEY DETAILS

- Policy Prepared by: Jonathan Brickell
- Approved by board / management on: 18/01/2018
- Policy became operational on: 18/01/2018
- Next Review date: 01/01/2019

#### INTRODUCTION

As part of your dealings with any member of the group of companies of which Rowes Garage Limited is the holding company (each company being a “Rowes entity”) we will collect and otherwise process personal information about you in order to supply vehicles, goods and services to you and to administer our relationship with you. This may involve sharing your personal information with third parties. This Privacy Policy describes in detail how we will use your personal information and how you can exercise your rights with respect to your personal information.

In this Privacy Policy, references to we, us or our (or words of similar import) means the Rowes entity that processes your personal information (as defined below) and interacts with you (for example, the entity from whom you purchase a vehicle or other services).

The documents you receive from any Rowes entity will identify the relevant Rowes entity that you are dealing with in any particular instance. These include:

Rowes Honda

Rowes Honda Liskeard

Rowes Honda Plymouth

Rowes Honda Truro

Rowes Honda Plymstock

Rowes Honda Hayle

Rowes Suzuki

Rowes Suzuki Liskeard

Rowes Suzuki Plymouth

Cars Too Good To Trade

In this Privacy Policy, references to you mean the person whose personal information (as defined below) we collect, use and process. This includes anyone who contacts us in connection with the purchase of a Vehicle and/or any goods or services we provide or otherwise interacts with us (for example, via a dealership).

In this Privacy Policy, references to Website means any website owned and operated by or on behalf of any Rowes entity including websites of our dealerships.

We are committed to protecting your privacy. We will use your personal information in accordance with the Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) and other applicable laws and regulations that relate to data protection and privacy.

#### WHY THIS POLICY EXISTS

This policy ensures Rowes Garage Limited:

- Complies with data protection law and follow good practice

- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals data
- Protects itself from the risks of a data breach

## DATA PROTECTION LAW

The Data Protection Act 1998 (DPA) and General Data Protection Regulation (GDPR) describes how organisations – including Rowes Garage Limited – must collect, handle, process and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

GDPR is underpinned by eight important principals. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than is necessary
6. Processed in accordance with the rights of the data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection.

## PEOPLE, RISKS AND RESPONSIBILITIES

### POLICY SCOPE

This Policy also applies to:

- The head office of Rowes Garage Limited
- All branches of Rowes Garage Limited
- All staff and volunteers of Rowes Garage Limited
- All contractors, suppliers and other people working on behalf of Rowes Garage Limited

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the DPA and GDPR. This can include:

- Names of Individuals
- Postal addresses
- Email Addresses
- Telephone numbers
- ...plus any other information relating to individuals

### DATA PROTECTION RISKS

This policy helps to protect Rowes Garage Limited from data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

### RESPONSIBILITIES

Everyone who works for or with Rowes Garage Limited has responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles. However, these people have key areas of responsibility:

- The **Board of Directors** is ultimately responsible for ensuring that Rowes Garage Limited meets its legal obligations.
- The **Data Protection Officer, Jonathan Brickell**, is responsible for:
  - Keeping the board updated about data protection responsibilities, risks and issues.
  - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
  - Arranging data protection training and advise for the people covered by this policy
  - Handling data protection questions from staff and anyone else covered by this policy
  - Dealing with requests from individuals to see the data Rowes Garage Limited holds about them. (Also called 'subject access requests').
  - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
  - Ensuring all systems, services, and equipment used for storing data meet acceptable security standards.
  - Performing regular checks and scans to ensure security hardware and software is functioning properly.
  - Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- The **Marketing Manager, Rebecca Moore**, is responsible for:
  - Approving any data protection statements attached to communications such as emails and letters.
  - Addressing any data protection queries from journalists or media outlets like newspapers.
  - Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

## DATA STORAGE

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Data Protection Officer or data controller.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **Protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing service**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard backup procedures
- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

## DATA USE

We may collect and process information about you, including your name, date of birth, address, contact details (including email address and mobile phone number), vehicle details, purchase history and data collected as part of any finance application or

payment (including previous addresses, employment details and bank account details). This information is referred to in this Privacy Policy as personal information.

**We may take personal information from:**

- Information that you provide to us when registering with our website (including your email address);
- Information that you provide when completing your online profile (including your name, gender, date of birth and any educational details and employment details you provide);
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us;
- Information relating to any purchases you make of our goods or services, including any other transaction details made via any of our websites (including your address, telephone number and payment details)

**Personal data we receive will be used for the purposes it was provided, including:**

- To respond to queries from you regarding the possible purchase of goods or services;
- To carry out our obligations arising from any contracts entered into between you and us including purchase of vehicles and provision of services, and to respond to queries from you regarding those contracts;
- To manage and administer the relationships between you and us (or one or more of the members of the Rowes Group);
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us; and
- To obtain feedback from you regarding us; and
- To provide you with reminders regarding your vehicle including, for example, when your vehicle is due to have a service or MOT undertaken.

In accordance with your preferences, we may also use your personal information to provide you with information about vehicles, services, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the vehicles, services, promotions and offers that are likely to be of particular interest to you. The section below entitled "What choices do I have?" explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or vehicle support services.

**Disclosing Personal Information.**

Your personal information may also be used by us, our employees, contractors or agents, and disclosed to third parties, in order to comply with any legal obligation (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us (or one or more Rowes entity)), or to protect our rights, property or safety or those of our customers, employees or other third parties.

- We may disclose your personal information to any of our staff, agents, suppliers or subcontractors where it would be reasonable to do so. (If consent is necessary to facilitate this sharing we will ensure it is obtained prior to processing)
- We may disclose your personal information to any member of our group of companies where it would be reasonable to do so. (If consent is necessary to facilitate this sharing we will ensure it is obtained prior to processing)
- We may be legally obliged to disclose your personal information to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information].

- Selected 3<sup>rd</sup> parties include Honda UK, Suzuki GB, Motability, JudgeService, AutoTrader, Smart Insurance, Supaguard, Gen3, DotMailer, Product Partnerships, Honda Finance, Suzuki Finance, Black Horse, Evolution Finance, Honda Care, Warranty Administration Services, Allianz & other carefully selected partners we work with.

**We will not sell your personal information to any third parties.**

## DATA ACCURACY

The law requires Rowes Garage Limited to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Rowes Garage Limited should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to ensure it is kept as accurate and up to date as possible.

- Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- Rowes Garage Limited will make it **easy for data subjects to update the information** Rowes Garage Limited holds about them. For instance, via the 'contact us' section on the company website.
- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the marketing manager's responsibility to ensure **marketing databases are checked against industry suppression files** every six months.

## SUBJECT ACCESS REQUESTS

You may instruct us to provide you with any personal information we hold about you, via a Subject Access Request (SAR)

- Upon receipt of such a request we will, after confirming identity, provide all relevant data we may hold to you in the most practical format unless otherwise stipulated and reasonably possible.
- We may withhold personal information that you request to the extent permitted by law.
- If you instruct us to no longer process your personal data we will do so as quickly as possible.
- If you instruct us to destroy any/all of your personal data we may hold we will do so as quickly as possible.
- If you instruct us to cease all processing for marketing purposes we will do so as quickly as possible.

Subject Access Requests will be prepared by the Data Protection Officer within 30 days, free of charge to the customer.

## COOKIES

We, Rowes Garage Limited, use Cookies on our website: [www.rowes.co.uk](http://www.rowes.co.uk)

### Managing your cookies

To find out how to allow, block, delete and manage cookies, follow the link below and select the browser you are using. You can also read your browser's built-in or online help for more information.

For more information about deleting and controlling cookies, please visit. [www.aboutcookies.org](http://www.aboutcookies.org)

## Social networking websites

Social networking websites may place cookies on your computer. Social bookmarks are a way of saving links to web pages that interest you, and sharing those links with other people. You should read their respective privacy policies carefully to find out what happens to any data that these services collect when you use them.

Read the [Facebook privacy policy](#)

Read the [Twitter privacy policy](#)

## DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, the DPA and GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Rows Garage Limited will disclose requested data. However, the Data Protection Officer will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisors where necessary.

## PROVIDING INFORMATION

Rows Garage Limited aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

## ICO REGISTRATION

We are registered as a data controller with the Information Commissioner's Office (ICO) and our registration number is: **Z1121234**

## Data Protection Officer

Our Data Protection Officer is Jonathan Brickell any Data Protection issues can be directed to our Data Protection Officer via email [jonathanbrickell@rowes.co.uk](mailto:jonathanbrickell@rowes.co.uk) or by calling 01752 364400.