

## Group Privacy Statement

The General Data Protection Regulation (or GDPR for short) is a positive step towards people having more control over how their data is used. On May 25<sup>th</sup> 2018 this new legislation came into force and we have changed a number of processes and policies to prepare our business. We are committed to protecting and respecting any personal information you share with us.

This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

We will always give you the option not to receive marketing communications from us. We will never send you unsolicited 'junk' email or communications, or share your data with anyone else who might. We do not sell your information to third parties, but we do work closely with selected partners who help us to provide you with the information, products and services that you request from us. For example, our manufacture parent who provide documentation relating your vehicle.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

### **What information do we collect?**

We collect information about you and your vehicle when you engage with our website, applications or manufacture partners who ask us to contact you when you make a request. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

The information we collect includes some or all of the following:

1. Name (including title);
2. Address;
3. Phone number;
4. Date of birth;
5. Email address;
6. Vehicle information (including registration number, VIN, service reminders, mileage and warranty repair information);

7. The date and time you used our services;
8. The pages you visited on our website and how long you visited us for;
9. Your IP address;
10. Your GPS location (where you have permitted access to this);
11. The internet browser and devices you are using;
12. Cookie, Pixels or Beacon information
13. The website address from which you accessed our website;
14. Details of any transactions between you and us;
15. Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses), fleet size and company details;
16. Voice recordings of calls you make to our customer service centre;
17. “Live chat” records; and
18. Any information within correspondence you send to us.

**How do we use this information?**

We will only process information that is necessary for the purpose for which it has been collected. You will always have the option not to receive marketing communications from us (and you can withdraw your consent or object at any time). We will never send you unsolicited ‘junk’ email or communications, or share your personal information with anyone else who might.

There are various ways in which we may use or process your personal information. We list these below:

**Consent:**

Where you have provided your consent, we may use and process your information to provide the latest information on the offers you enquired on:

|                            | Car                      | Van | Truck |
|----------------------------|--------------------------|-----|-------|
| Prospect Vehicle Customers | Consent (After 6 months) |     |       |
| Prospect Parts Customers   | Consent (After 6 months) |     |       |
| Prospect Service Customers | Consent (After 6 months) |     |       |

**Contractual performance**

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us.

|   | Car                    | Van | Truck |
|---|------------------------|-----|-------|
| Existing Service Customers (Contract)     | Contractual Obligation |     |       |
| Customer Satisfaction Index Communication | Contractual Obligation |     |       |

## **Legitimate Interests**

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

|  | Car  | Van | Truck |
|--|--|-----|-------|
| Existing Vehicle Customers               | (Purchased up to 5 years ago) Legitimate Interest  |     |       |
| Existing Parts Customers                 | (Purchased up to 2 years ago) Legitimate Interest  |     |       |
| Existing Service Customers (No contract) | (Up to 2 years from last work) Legitimate Interest |     |       |
| MOT                                      | Legitimate interest                                |     |       |

Where appropriate, we will contact service customers (those who are active within the last two years) with sales messages regarding our latest offers. Through a legitimate interest assessment we have determined this is in the best interest of our customers.

## **Legal Obligation**

We may process your personal information to comply with our legal requirements (for example to register your car with the DVLA).

## **Vital Interest**

Sometimes we will need to process your personal information to contact you if there is an urgent safety or product recall notice and we need to tell you about it.

## **How do we share this information?**

We do not sell your information to third parties. However, we may from time to time disclose your information to the following categories of companies or organisations to which we pass the responsibility to handle services on our behalf: our manufacturer partners, roadside assistance service providers, customer contact centres, mobility and car hire providers, direct marketing communications agencies and consultants, market research and market analytics service providers, our legal and other professional advisors.

We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated none specific data sets where ever possible.

## **How long do we keep your information for?**

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

We do not retain personal information in an identifiable format for longer than is necessary.

If we have a relationship with you (e.g. you are a customer or the registered driver of a leased or other vehicle purchased from us), we hold your personal information for 6 years from the date our relationship ends. We hold your personal information for this period to establish, bring or defend legal claims. Our relationship may end for a number of reasons including where the vehicle warranty or lease expires, or we have been made aware that you no longer own or drive that vehicle.

Where we have obtained your personal information following a request for information, test drive, brochure, quotation or any other information on any of our products or services, we hold your personal information for 1 year and 6 months from the date we collect that information, unless during that period we form a relationship with you e.g. you purchase or lease a vehicle. We will continue to process your data in line with your initial enquiry for 6 months to allow us an opportunity to form a relationship with you. After this your data will remain dormant for 1 year before being removed, unless a relationship is formed within this time.

The only exceptions to the periods mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- Where you have raised a complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law

### **Employee, Worker, Supplier and Consultant Data**

Where we have collected your personal data for the purpose of employment with the company, we will hold on to your data as necessary for the period of your employment with us. We will continue to hold on to your data after your employment ends, only as long as is necessary for any contractual or legal obligations.

When you enter a relationship with us as a supplier or consultant we will hold onto your data for the length of our relationship. When our relationship ends we will only hold onto your data long enough to fulfil any contractual or legal obligations.

## Cookies

We use cookies to record the preferences of visitors, to enable us to optimize the design of our web site. Cookies are small files which are stored on your hard drive. They ease navigation, and increase the user-friendliness of a web site. Cookies also help us to identify the most popular sections of our web site. This enables us to provide content that is more accurately suited to your needs, and in so doing improve our service. Cookies can be used to determine whether there has been any contact between us and your computer in the past. Only the cookie on your computer is identified.

Most browsers automatically accept cookies. You can prevent cookies from being stored on your hard drive by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your hard drive at any time. If you choose not to accept cookies, you can still visit our website, however this may result in a reduced availability of the services provided by our web site.

### Analytics Cookies

These cookies allow us to count page visits and traffic sources so we can measure and improve the performance of our site, using a service provided by Google Analytics.

### Third Party Cookies

We may use a number of social media tools to enhance visitor interaction on our site. If you already use these platforms their cookies may be set through our website. Data may then be collected by these companies that enables them to serve up adverts on other sites that they think are relevant to your interests. If you do not use such platforms, then our site will not place these cookies on your device.

### Functional Cookies

These cookies are used to enable core site functionality. They do not contain any personal information and are automatically deleted when you close your browser.

## **How can I manage the information we hold about you**

You have the right as an individual to access your personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request.

You have the right to:

- 1) Ask for a copy of the information that we hold about you;
- 2) Correct and update your information;
- 3) Withdraw your consent (where we rely on it). Please see further [How do we use this information;](#)

- 4) Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
- 5) Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
- 6) Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

Please be mindful that if you make a request to alter, update or delete your personal details from our system, we will endeavour to action your request as quickly as possible. However in some rare instances, please allow up to 30 days for your request to take effect.

In the case of a subject access request or a request for information, please be aware that if your request is unfounded or excessive, we may still charge a fee or refuse to act on the request.

Please also be aware that when we remove your data from our system, either after the periods of time mentioned previously in this document or at your own request, your data is permanently removed from our system and may affect any future subject access requests that you make.

You can exercise the above rights and/or manage your information by contacting us using the details below:

Post: Imperial UK - Registered Office: Imperial House, 14/15 High Street,  
High Wycombe, HP11 2BE, UK.

Email: [data@imperialuk.co.uk](mailto:data@imperialuk.co.uk)

If you have any specific data protection concerns or a complaint, you can address it to our Data Protection Team at [data@imperialuk.co.uk](mailto:data@imperialuk.co.uk)

If you are unhappy, you have the right to lodge a complaint with Information Commissioner's Office, the data protection regulator in the UK, details below:

Post:  
Information Commissioner's Office

Wycliffe House  
Water Lane Wilmslow  
Cheshire SK9 5AF

Call: 0303 123 1113