

Privacy Policy

The Policy

This privacy policy sets out how we gather, use, hold, share, disclose and protect ("process") any personal information that you give to us when you use Bullcroft Car Sales. By continuing to use Bullcroft Car Sales. you are accepting this policy.

Some personal data information is essential to Bullcroft Car Sales. functioning and our supplying a service to you. If you do not wish to allow us to process your data then you will not be able to use our services.

Useful contact details and a summary of the control you have over your personal data can be found at the end of this policy.

Compliance

In processing personal data, we will comply with relevant legislation in force from time to time in the UK. We may change this policy, without notice from time to time by updating this policy as we improve our service to you and as relevant Data Protection legislation comes into force. Your personal information will continue to be held in accordance with our policy as it develops. We will not reduce your rights under this policy without your explicit consent.

Legal Basis for Processing

Likely Processing

We gather data on two groups

I. the non-registered viewer of our website in which our services are described ("Viewer")

II. those making enquiries for test drives and for other information ("Enquirers")

III. our Customers applying for finance or other applications ("Customers")

- Where you are merely a Viewer we will normally only gather data indirectly but might also do so directly if you i) request further information from use ii) engage with us on social media as examples.
- Where you are our Enquirers or Customers we will gather data indirectly and directly.

Lawful Basis

We are required to process your personal data in a lawful, fair and transparent manner.

Consent – where you are a Viewer you will be accepting our cookie policy in order to continue to view how our services operate. We detail below the extent of indirect use of data which is anonymised and is not designed to identify you individually.

Contract – where you are Customers inquiring about obtaining finance or entering into a contract with us in, or during the process of registering with us, we process data necessary to answer your enquiry and process your account in order to provide you with these services. Our service may include being in contact with you as follow up even after your initial question has been answered, to maintain your registration with us including carrying out verification checks.

Legitimate Activities – where we are required to store or use information for legal purposes, for example where you are requesting a test drive or we are following up a vehicle purchase with MOT reminders or you have been a Customer for contractual purposes as above, we do so as part of our legitimate activities as a lawful business.

Data Controller and Processor

Bullcroft Car Sales. makes the decisions concerning how personal data through Bullcroft Car Sales. is processed. Accordingly we are the Data Controller for your personal information. Therefore we should be your first point of contact.

Bullcroft Car Sales. uses a third party, Autoweb.co.uk Ltd, to help power its website and Customer contact management system. This provides you with an improved service and better user experience. They process your personal information as set out in this policy and they do so under our direction. Accordingly they act as a Data Processor. Should you have any concerns about this please do not hesitate to contact us.

Bullcroft Car Sales's Website Anonymous Tracking

Some personal data may be processed by us when you are merely browsing Bullcroft Car Sales.

Cookies

You can choose to accept or decline cookies from our website.

A cookie is a small file which is placed on your device when you visit a website. The file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies help us provide you with a better website by tailoring the website operations to your needs and to respond to you as an individual user such as identifying which pages you find useful and which you do not. Such a cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and does not identify you individually.

Merely by browsing our website, Bullcroft Car Sales tracks your use so that we can offer you a better user experience relating to your navigation habits. This helps us analyse data about social media traffic and improve Bullcroft Car Sales. in order to tailor it to the needs of our customers.

Website Tracking Technology

Our website uses tracking technology to help us to analyse user behaviour. Google Analytics is an example of this technology. It is an analysis service by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. Google Analytics allows us to analyse the use of our website application usage.

The information about your visit collected by Google Analytics is usually transferred to a Google server in the USA and saved there. Google will use the information collected on behalf of the application operator to evaluate the users' use of the application, to compile reports about the users' activities within this application, and to provide further services for the application operator related to the use of the application.

You can find more information about what data can be collected via Google Analytics at [Google Analytics Support](#)

By using the website, the user explicitly consents that his or her information is collected via Google Analytics.

What we might collect

Bullcroft Car Sales. collects the following types of information.

- identification of your past and current use of Bullcroft Car Sales.
- technical information from your device to enable it to interact with our system
- information about your visits including page response time, pages visited, methods of browsing and similar

Direct Information Gathering

Some personal data may be processed by us when you have requested a product or service from us, whether as part of an agreement to purchase from us or merely requesting further contact from Bullcroft Car Sales.

Risk and Personal Data

Please note that sending information over the internet is not completely secure and we cannot guarantee the security of your data while it is in transit. Any data you send is at your own risk. Please do not include sensitive personal data sent over the internet.

What we might collect

- Name

- Contact information including postal address, email address and telephone contact details depending on the service you are requesting
- Demographic information such as post code and location
- Other information relevant to your existing car, vehicle and price preferences, driving licence status, availability
- Interest in customer surveys and/or offers

Compilation of Data

In order for the vehicle search function on Bullcroft Car Sales. to operate, it is essential that we hold onto and connect data together to identify you and your preferences. This will include location data, your name and similar information, demographic information (for example the number of seats required), price or finance options.

Location Data

We use a third party provider to recognise and populate postcode searches. Holding of this data including search histories is held in accordance with the privacy policies of these third parties. We use our reasonable endeavours to ensure that such policies will not diminish your rights. We do not link historical searches with your name.

Financial Information

If you are requesting a finance option on-line then we will redirect you to a third party provider's website. They will have their own privacy policy that you will need to consider when supplying information to them. You should assure yourself that you are content with their policy as you will be supplying sensitive data to them. Please note that we do not control these third parties and cannot take responsibility for their handling of your personal financial information.

Testimonials

We would be delighted if you would provide us with testimonials of your great experiences with us. We will review these before placing them on our marketing literature including our website and will only use your first name or an assumed name if you so wish. Should you wish for your testimonial to be removed please let us know using the contact details provided below.

Customer Experiences

We may also keep data to record the appreciation shown by a customer and their experiences. This is for internal purposes to enable us to check that we continue to provide an excellent service. If the record is initiated by us then we will anonymise it, using only first names.

Should the record be initiated as a result of a request or complaint by you then only essential information relating to the issue will be kept and in that event for no longer

than [3] months unless you request otherwise. After [3] months we may retain information showing the fact of the request or complaint for training purposes but the information will be anonymised.

What we do with the information we gather

We take different types of information from you. Processing of anonymous data is either stored on your device and not accessed by us (e.g. cookies) or informs our statistical analysis on website and page use (e.g. traffic cookies, Google Analytics).

Processing of your personal information involves a number of different actions depending on why you have supplied us with information:

Storage

The information we hold about you may be stored outside the European Economic Area in order to process your data.

Initially your personal information is held securely by Autoweb. They would not normally view or use your personal information unless there is an issue with the use or security of holding your data.

In normal circumstances your information is held by (client name) for a maximum of [3] months or indefinitely if you have opted in or there is another basis for holding your data

Anonymous Tracking

We use anonymous tracking to:

- to customise our website according to your preferences and tastes
- to improve how we display information on our products and services on our website for your benefit and in keeping with your device
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Initial Response

We require your personal information to handle our initial response with you. To improve your customer experience, and based on feedback we receive, we may vary from time to time the types of information we ask for. Common types of information we ask for might include:

Location Data: we take your location details in order to inform you where we are located closest to you and how you can travel to us. This will also inform us of where your local dealer is and enable us to further handle your personal information accordingly.

Vehicle search: the data we compile from you relating to your vehicle searches enable us to provide you with immediate search results automatically generated. Further compilation of your data is likely to be done by your local dealer when reviewing an expression of interest by you in order to make further suggestions. Such further searches maybe intuitive rather than automated.

Brochure Requests: we take your name and address to accurately send to you our latest sales brochure.

Test Drives: we take your name and address to enable you to come and test drive one of our cars. In addition we may require you to supply beforehand information related to your lawfully being allowed to test drive one of our cars. We may need to hold this information for an extended period for legal reasons in order to deal with any complaints that arise from the test drive or to supply to our insurance company. Details other than your name and address will be kept differently.

Finance Application: we don't take your personal financial details but direct you to a third party who will take a number of details concerning your financial status. We work closely with this third party but we are not the same company and you must assure yourself that you are content with their privacy policy.

Further Processing

Once information is received by us it is stored centrally. We then use location data to supply your local dealer with a copy of your contact details and other information relevant to your request in order for them to be in contact with you.

The personal information enables our dealer:

- to operate the Bullcroft Car Sales. customer service and respond to your enquiry
- for internal record keeping, to follow up your enquiry at times convenient to you. This may mean that your local dealer i) attempts multiple contacts with you to fulfil your requests for contact ii) holds your data for up to [3] months to answer any follow up discussed with you

After a period of 3 months your local dealer will delete your personal information from its local records.

Supplying your data to third parties

Where we must share your data for the purposes of providing you with the services you have requested we will use reasonable endeavours to put in place contractual and practical systems to protect your personal information securely. Further we will

notify them of any preferences you have indicated concerning use of your personal data.

Future Marketing

- depending on your consent we may periodically use your contact details to send you promotional emails or texts about new products, special offers or other information which we think you may find interesting using the contact details which you have provided
- depending on your consent to contact you, using your contact details, for market research purposes
- depending on your consent, supply of your contact details to third parties for use with related marketing messages

Your data will be initially held with Autoweb for up to 30 days from date of enquiry and then deleted. Marketing data is accessible separately from other information we might have relating to you.

Request for Deletion of information

If you have provided your consent to receive future marketing messages then we will hold this information until you indicate that you no longer wish to receive messages from us.

If you contact us to indicate that you no longer wish to receive messages from us we may store that indication centrally.

Contracts with you

We would not normally use information obtained via our website to finalise contracts with you. Such information will be held in separate records. In the event that such personal information is used to enter into contracts with you it will be transferred and its accuracy checked in that process. Should such data be used to assist in purchases made with you then that information may be held as part of our accounting records held by us for compliance purposes. Only data sufficient for these purposes will be held and this data will be held securely and is kept separately and only for the purposes of tax compliance.

Business Purchase or Sale

Please note that if the business were to be sold or transferred or we were to purchase another business, your data will be transferred with it but only as part of the business as sold or transferred. Your personal information may be disclosed to a prospective buyer or seller of such business.

External Sites and Social Media

When you connect to or from Bullcroft Car Sales. using external websites please be careful to check whether the external site is one controlled by us (usually our social media spaces on platforms such as Facebook, Twitter or LinkedIn) or those used by third parties. We cannot control the information practises of other companies and organisations that might advertise, display, link to, or offer to obtain our goods or services for you. We cannot take responsibility for, cannot control and this policy does not cover spaces on the internet not controlled by us.

Linking to other websites

Similarly our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Note also that third party cookies might be downloaded onto your device as a result of your use of this website, for example if you were to send information to or from this website to your social media account your account may require the use of such cookies to enable this transfer to take place. These cookies are not under our control and we disclaim any responsibility for the acts of third party cookies.

Posting Comments & Social Media

Please note that if you choose to post comments on this website or via our social media accounts containing personal data we cannot accept responsibility for the use or misuse of such data by others who have access to such posts and we suggest that you consider carefully before posting any such data. Please note that we may review tracking data generated by social media providers such as Facebook for measuring how useful our social media presence is for you.

Social Media Data Gathering

We employ technology to help us identify when you might have encountered us through social media or to send you targeted marketing messages relating to products we have to offer during your social media experience. The use of this technology does result in our holding your personal contact details and likes and dislikes. We do not categorise this information based on what the law describes as “sensitive personal data”.

Facebook as an example of Social Media Integration

Bullcroft Car Sales. integrates with different social media to the benefit of communicating with you. In order to explain how some social media works we have set out below one example of how your data is used in this case by Facebook. Other

social media use your data in different ways and you should review the privacy policy of each provider should you be concerned.

USA. Facebook is used to share activities on Facebook and to get Facebook information about Bullcroft Car Sales. users. An overview of Facebook integrations and social plugins can be found here: <http://developers.facebook.com/docs/plugins/>.

When users enable the Facebook connection in their settings, the Facebook integration establishes a connection between a user's device and the Facebook server. Thereby, Bullcroft Car Sales. receives information about the user.

When users invite friends via Facebook, the Facebook integration establishes a connection between a user's device and the Facebook server. That allows the user to gain information about his or her friends via Bullcroft Car Sales. Bullcroft Car Sales. as the provider of Bullcroft Car Sales. does not receive any of this information.

When users share their information on Facebook and when they invite friends via Facebook, the Facebook integration establishes a connection between a user's device and the Facebook server. Thereby, the user links information on Bullcroft Car Sales. to his or her Facebook account. That allows Facebook to correlate a user's usage of Bullcroft Car Sales. with the corresponding user's Facebook account. Bullcroft Car Sales. as the provider of Bullcroft Car Sales. does not have any knowledge of the future data usage by Facebook. Users can find more information on that issue in the privacy policy of Facebook at: [Facebook Privacy](#)

Users have to actively enable the Facebook connection in their Settings in order to be able to share information on Facebook and invite friends via Facebook. If users do not want Facebook to gain information on their Bullcroft Car Sales. usage or if they don't want Bullcroft Car Sales. to gain information about them via Facebook, they should leave the Facebook integration disabled as it is in the default settings. Once enabled, users can disable the Facebook connection again in their Settings at any time.

By activating the Facebook connection in his or her settings, the user explicitly consents to the information exchange described in this section. Any data arising from the use of Facebook will be located outside the EEA and subject to transmissions between the EEA and elsewhere.

Controlling your personal information

Your Rights

Data Protection legislation gives you certain rights to control of your personal data. These are:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing

6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

Further information on these rights can be obtained from the UK Information Commissioner whose website is at: ico.org.uk

We fulfil these rights in the ways set out below however we do reserve our right to continue to process your data or refuse your requests as set out in relevant legislation.

Privacy Policy

By detailing the information we gather and process in this Privacy Policy.

Cookies

You can choose to accept or decline cookies from our Website. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and cookies via these links:

- [Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [OSX Safari](#) / [iOS Safari](#)
- [Edge](#)

However, if you block cookies, you will not be able to use all the features on our website and may not be able to use our platform.

Consent

You have control over the information you supply to us whether by:

- i) consent gained from your continuing to browse our site, or
- ii) your explicit consent by completing a contact form whether for requesting [a test drive, requesting a brochure seeking finance], or
- iii) your explicit consent to further processing to send you ongoing marketing material concerning our [cars, offerings and services], or
- iv) by your contacting us about your personal information as described below.

Consent for the direct purpose for which you supply your data will be inferred from the situation in which you give this information. If you choose to withdraw your consent to the processing of your personal information at any time then you should inform us in writing using our contact details below.

Data Requests

You may request details of personal information which we hold about you under the relevant Data Protection legislation in force at the time (a "Data Subject Access Request"). If you would like a copy of the information held about you, please email us.

Data Correction, Complaints & Deletions

If you believe that any information we are processing on you

- is incorrect or incomplete, (perhaps for example because you have seen your name spelt incorrectly or someone else has received a call meant for you) or
- is being mis-used (perhaps for example a company you don't know has contacted you using information you supplied to us and you didn't agree to this), or
- should no longer be processed by us (perhaps for example because you no longer wish to be contacted)

then please email us as soon as possible. We will promptly correct or delete any information found to be incorrect or no longer necessary and deal with your complaint.

We ask that if you have any concern you first approach us via our contact email address () or telephone number.

Should you wish to take the matter further we ask that you contact us in writing setting out your concerns in detail to enable us to provide you with an effective response.

Lawful Disclosure by Us

Please note that you hereby provide your consent and in any case we may be required to disclose your data to lawful authorities for the prevention of crime or regulatory purposes or a court as such court requires. In some circumstances we may not be permitted to inform you that we have made such a disclosure.

Contact Details

Bullcroft Car Sales. is the trading name of Bullcroft Car Sales. whose registered office is at:

34 Skellow Rd,

Carcroft,

Doncaster

DN6 8HA, UK

Our contact email address is info@bullcroftcarsales.co.uk

Our address and contact for written correspondence is

Any Data Subject Access Request should be made to the following email address
info@bullcroftcarsales.co.uk

Example 2

GDPR Privacy Notice

Car Dealer 5 Limited is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about

you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

Car Dealer 5 Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, addresses, telephone numbers, and personal email addresses.
- Gender.

We do not collect, store and use any "special categories" of more sensitive personal information.

How is your personal information collected?

We collect personal information directly from you.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform a contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need all the categories of information in the list above (see The kind of information we hold about you) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

What we use your personal data for	Our reasons
To provide services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, eg in relation to our	For our legitimate interests or those of a third party

financial performance, customer base, work type or other efficiency measures	
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party
Marketing our services to: - existing and former customers; - third parties who have previously expressed an interest in our services; - third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

We may have to share your data with third parties, including third-party service providers including finance providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client of the company we will retain and securely destroy your personal information in accordance with our privacy standard.

Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our data privacy manager in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our data privacy manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection manager

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the data privacy manager.

Cookies Policy

We collect information about you automatically when you visit the Website. The Website uses cookies to collect these details.

A cookie is a small text file that is placed on your computer's hard drive by your web browser when you first visit the Website. The cookie allows us to identify your computer and find out details about your previous visit.

We use cookies to:

Detect if you have chosen to view the Website via mobile device or desktop machine.

Gather statistics about how you use the Website, which web pages you visit as well as what other sites you visit before visiting the Website and after the Website.

Some of the cookies are set by us, and some are set by third parties (such as Google). you can see the Google Privacy Policy [here](#).

By continuing to use this Website we will infer that you accept our cookies policy and give Car Dealer 5 permission to continue serving your browser cookies for the above purposes. We reserve the right to edit, remove or add new cookies or similar technologies at any time and without notification. If you do not want to accept these terms simplye discontinue using this Website.

Most web browsers automatically accept cookies but, if you prefer, you can change your browser settings to disallow all or some cookies as well as view the cookies that are currently saved on your computer. To change your cookie settings, we strongly recommend that you refer to your internet browsers manual or manufacturer for instructions on how to use this feature. Alternatively you may choose to visit www.allaboutcookies.org or www.youronlinechoices.co.uk for instructions on how to do this on common browsers.

Please be aware that if you choose to delete, disable or block some or all of the cookies used by this Website, then we cannot guarantee that all of the Website features will continue to function correctly.

Use of Your Information

By using this Website, you agree in entirety that we may collect, hold, process and use your information (including personal information) for the purpose of providing you with the Website services. These include (without limitation):

Communicating (and personalising such communication) with you
Compiling customer reviews
For any purpose required by law or regulation

If you would like to unsubscribe from any email communications, please click on the link located at the bottom of the email and to follow the instructions.

Images

Car Dealer 5 will not be held responsible for any unauthorised images uploaded to any Car Dealer 5 client website. Every care is taken to check images for copyright however full responsibility is held by the Car Dealer 5 client.

Content and Links

Once a client is set up in the Car Dealer 5 platform it is the responsibility for said client to manage content and outbound links. Car Dealer 5 will not be held responsible for incorrect links or content.

* Ordering a Car Dealer 5 website

When placing an order for a Car Dealer 5 website online or by phone, we do not store credit card details however we do share your details with our partners who we feed your stock to.

Privacy & Cookie Policy

The policy: This privacy policy notice is served by Hilton Car Sales under the website; <https://www.hiltoncarsales.co.uk/>. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information through the business and while you browse or use this website. If you do not agree to the following policy you may wish to cease viewing / using this website, and or refrain from submitting your personal data to us.

Policy key definitions

- "I", "our", "us", or "we" refer to the business, [Business name & other trading names].
- "you", "the user" refer to the person(s) using this website.

- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a users computer or device.

Key principles of GDPR

Our privacy policy embodies the following key principles; (a) Lawfulness, fairness and transparency, (b) Purpose limitation, (c) Data minimisation, (d) Accuracy, (e) Storage limitation, (f) Integrity and confidence, (g) Accountability.

Processing Your Personal Data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

Lawful basis: Legitimate interests

Where our purpose for processing is: *To allow us to contact you regarding the services we provide.*

Which is necessary because: *To allow us to respond to queries about the services we provide.*

We process your information in the following ways: *Collection of contact details via our websites contact form.*

Data retention period: *We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.*

Sharing your information: *We do not share your information with third parties.*

Your Individual Rights

Under the GDPR your rights are as follows. You can read more about [your rights in details here](#).

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the [ICO](#) if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

Internet Cookies

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device to track how you use the website.

We use a cookie notice which informs you of cookie usage on this website. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

Cookies that we use are: -

- Analytical/performance cookies (Google Analytics). 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.

Privacy Policy for East Leeds Car Sales

At East Leeds Car Sales, accessible from <https://www.eastleedscarsales.co.uk>, one of our main priorities is the privacy of our visitors. This Privacy Policy document contains types of information that is collected and recorded by East Leeds Car Sales and how we use it.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to [contact us](#).

This Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared and/or collect in East Leeds Car Sales. This policy is not applicable to any information collected offline or via channels other than this website.

Consent

By using our website, you hereby consent to our Privacy Policy and agree to its terms.

Information we collect

The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

If you contact us directly, we may receive additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide.

When you submit an enquiry, we may ask for your contact information, including items such as name, company name, address, email address, and telephone number.

How we use your information

We use the information we collect in various ways, including to:

- Provide, operate, and maintain our website
- Improve, personalize, and expand our website
- Understand and analyze how you use our website
- Develop new products, services, features, and functionality
- Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the website, and for marketing and promotional purposes
- Send you emails
- Find and prevent fraud

Log Files

East Leeds Car Sales follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

Cookies and Web Beacons

Like any other website, East Leeds Car Sales uses 'cookies'. These cookies are used to store information including visitors' preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

For more general information on cookies, please read [the Cookies article on ICO website](#).

Advertising Partners Privacy Policies

You may consult this list to find the Privacy Policy for each of the advertising partners of East Leeds Car Sales.

Third-party ad servers or ad networks use technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on East Leeds Car Sales, which are sent directly to users' browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit.

Note that East Leeds Car Sales has no access to or control over these cookies that are used by third-party advertisers.

Third Party Privacy Policies

East Leeds Car Sales's Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

GDPR Data Protection Rights

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

The purpose of this document is to outline our Privacy Policy in a clear and easy to understand language. We aim to be as transparent as possible about the information we collect and how we use it. However, if you have any questions or you feel anything is unclear, please contact us at privacy@engineroomtechnology.com.

Data we collect

Engine Room Technology is the provider of this website and collect the following data on behalf of the business owner of whose website this is. We collect the following data:

- If contact is made via an online form, with consent, the submitted information is stored so that the intended recipient can contact you about your query
- If you sign up to a newsletter or other form of email communication, with consent, the submitted information is stored so that we can email you the subscribed-for service
- By using this site, we collect information about your browser, your IP address, geographical location, referral source and the pages you have viewed on the site

How we use this data

Under GDPR we store data for Legitimate Interests or with Consent. This means the data you have submitted has been done so under the knowledge that it will be used for us to fulfil a service you have requested or to make contact with yourself.

We also use the data gathered to improve the services on our website. This may be to personalise the experience to you or to understand how to improve interaction with users of the site.

How your data is protected

We do not share or sell your data to any business or Third Party. Data is only stored by consent and kept only for as long as deemed necessary to fulfil the request or service provided.

Your data is kept secure and you have the Right to be Forgotten. This means that at any point, at your instruction, you can request to see what data we currently have on file about yourself and demand that it be edited or removed. Where possible, we allow you to manage what data is stored by us.

If you would like to make a request relating to your data, please do so by contacting us on privacy@engineroomtechnology.com.

Third Party Providers

We use Third Party Providers for a range of services. This includes services such as a live chat system, analytical tracking services and finance applications. At no point do we ever share your information to any other Third Party outside of the service that you are using. In most cases we will navigate you to a Third Party website or service to handle any personal information (such as making a finance request). We do not have access to any of this information and is held completely by the Third Party. For a full list of Third Party Providers that we use and links to their Privacy Policies, please visit: <https://www.engineeroomtechnology.com/third-party-providers>

Navigational and anonymous information

We use cookies on our website. These are very small text files that are placed on your device. Cookies allow us to store information between the pages you navigate on the website. We store preferences such as your search requirements, if you have visited the site before and general navigational and functional use of the site. Cookies have a lifespan and will expire after a set period of time (30 days). You can also remove them if you wish. For more details on cookies, please visit: <https://www.whatarecookies.com>

We also use Third Party cookies and tracking pixels. These are used to monitor the performance of our advertisements, how users use our site and to pass any anonymous or usage data to a Third Party service you are using.

We track the minimal amount of data needed to fulfil our services and where possible keep any usage data anonymous. Personal information may be available to us based on privacy agreements that you have agreed to from other Third Party services. For example, we use Google Analytics to track how users are using the website. Users with a Google Account may have agreed to allow their age demographic to be known. We will then use that data to analyse the type of users interacting with our site. This information is anonymous and must be opted into. For more information about our Third Party Providers, their Privacy Policies and how

to request your data be amended or removed, please visit: <https://www.engine room technology.com/third-party-providers>

Changes and notices

We reserve the right to change this policy without notice to comply with laws, regulations and any changes in our business.

If you disagree with any part of this policy, you should refrain from using our services.

Our details

This website is provided by:

Engine Room Technology Ltd.
Home Farm,
Kelty,
KY4 0JR,
United Kingdom

Data protection company officer:
Dan Gross

TEMPLATE 6

1. Introduction:

- State the purpose of the policy: to inform customers about how their personal information is handled.
- Define "personal information" in the context of the policy.

2. Information We Collect:

- Specify the types of personal information collected, such as:
 - Contact information (name, address, phone number, email).
 - Vehicle information (make, model, year, VIN).
 - Financial information (if applicable).
 - Website usage data (if applicable, such as cookies).

- Explain how this information is collected (e.g., through forms, website interactions, phone calls).
- Mention if you collect any "special categories" of personal data (e.g., ethnicity, religion) and if so, why.

3. How We Use Your Information:

- State the lawful basis for processing personal data (e.g., contract, consent, legitimate interests).
- Explain how the collected information is used, such as:
 - Responding to inquiries.
 - Processing vehicle purchases or sales.
 - Providing customer service.
 - Sending marketing materials (with consent).
 - Managing website traffic and user behavior (if applicable).

4. Sharing Your Information:

- Explain who you might share information with, such as:
 - Financial institutions (for financing).
 - Third-party service providers (for marketing, analytics, etc.).
 - Other affiliated companies (with your consent).
- Clarify that you will not share information without consent, except as required by law.

5. Data Security:

- Outline the measures taken to protect personal information, such as:
 - Security measures (e.g., encryption, firewalls).
 - Internal procedures for handling personal information.

6. Data Retention:

- Explain how long you retain personal information.
- State that you will only retain information as long as necessary for the purposes outlined in the policy.

7. Your Rights:

- Explain the rights customers have under data protection laws, such as:
 - Access to their data.
 - Right to rectification (correct inaccuracies).
 - Right to erasure (deletion).

- Right to object to processing.
- Right to data portability (transfer data to another service).

8. Cookies and Tracking:

- Explain if you use cookies or other tracking technologies on your website.
- Provide information about how customers can manage their cookie preferences.

9. Changes to the Policy:

- Indicate that you may update the privacy policy from time to time.
- State how customers will be informed of changes.

10. Contact Information:

- Provide contact information for questions or concerns regarding the privacy policy.

11. Compliance with Laws:

- State that the policy is in compliance with relevant data protection laws (e.g., GDPR, CCPA).

Example Clauses:

- **Data Collection:**

"We collect your name, address, phone number, and email address when you submit an online form or contact us by phone."

- **Use of Data:**

"We use your information to respond to your inquiries, process your vehicle purchase, and provide you with customer service."

- **Data Sharing:**

"We may share your information with financial institutions for financing purposes, with your consent."

- **Data Security:**

"We take reasonable steps to protect your personal information, including implementing security measures and following internal procedures."

Privacy Policy

Ewshot Sales & Service Ltd are committed to protecting and respecting your privacy and personal data. This Privacy Policy describes how we will use your personal information and how you can exercise your rights under the General Data Protection Regulation (GDPR).

Data controller and contact information

The data controller is Ewshot Sales & Service Ltd. If you have any questions, comments or requests regarding this Privacy Policy, please feel free to contact us at:

Data Protection Officer
Ewshot Sales & Service Ltd
Crondall Road Crondall Farnham GU10 5RP
01252 850 460
sales@hamptonsofsurrey.co.uk

Purposes and lawful basis for processing personal data

We may collect, process and use your personal data in the course of supplying vehicles, goods and services to you and to manage our relationship with you, in the following ways:

Processed under the lawful basis of Contract:

- When you enquire about or purchase a vehicle, goods or services from us, we will collect personal information to enable us to respond to your enquiry and to process and complete your purchase.
- When you enquire about purchasing a vehicle on finance, we will collect information to enable third parties to provide finance quotes and agreements.
- We collect personal information from you when you apply for a job with us to enable us to contact you and process your application.

Processed under the lawful basis of Legal Obligation:

- We collect and process your personal information for producing invoices and accounting purposes which is required to meet HMRC legislation.
- We collect personal information from employees to enable us to meet employment law obligations.

Processed under the lawful basis of Consent:

- If you have given consent to receive marketing communications from us, we will collect information concerning your marketing preferences and send you communications based on those preferences.

Who we share your personal data with

We do not share your data with any other third parties except:

- if you have given your consent.
- if it is necessary to enable the provision of third party services you have requested (for example to facilitate warranty, insurance or finance quotes or agreements).
- if we are under a duty to comply with any legal obligation.

Third party recipients of your data

Data processors are third parties who provide elements of our business management services for us, who process or store personal data on our behalf. The categories of these recipients are accounting, marketing, software, and website providers.

We have contracts in place with our data processors to ensure they are looking after your data to GDPR standards, which means they cannot use, share or do anything with your personal data unless we have instructed them to do so.

Vehicle documents

Any documents which arrive with a vehicle when it is taken into stock may be shown to any potential buyers and handed to any new owner to ensure the provenance of the vehicle.

Retention periods

Unless otherwise listed below, your personal data will be kept for a period of 7 years in order to comply with HMRC requirements.

Personal data processed under consent will be kept for as long as you consent to its processing. We will seek to refresh your consent at appropriate intervals.

Your rights in regard to your personal data

You have a number of rights in regard to your personal data. These include the right to request access to, rectification or erasure of personal data we hold, or restriction of processing concerning your data, or to object to the processing as well as the right of data portability. If you wish to make any such requests please contact us in writing using the contact details at the top of this page.

Right to withdraw consent

Where we have processed your personal data on the lawful basis of consent, you have the right to withdraw this consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Right to complain

If you have any concerns about how we have handled your personal data, please contact us so we may address them.

You also have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office, about how we manage your data.

Provision of data

In most cases, the provision of your personal data is necessary to enter into a contract with us.

Changes to this policy

We will regularly review this privacy notice and update it where necessary. This policy was last updated in September 2020.

Privacy Policy

Ewshot Sales & Service Ltd are committed to protecting and respecting your privacy and personal data. This Privacy Policy describes how we will use your personal information and how you can exercise your rights under the General Data Protection Regulation (GDPR).

Data controller and contact information

The data controller is Ewshot Sales & Service Ltd. If you have any questions, comments or requests regarding this Privacy Policy, please feel free to contact us at:

Data Protection Officer
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Crondall Road Crondall Farnham GU10 5RP
01252 850 460
sales@hamptonsofsurrey.co.uk

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- When you enquire about purchasing a vehicle on finance, we will collect information to enable third parties to provide finance quotes and agreements.
- We collect personal information from you when you apply for a job with us to enable us to contact you and process your application.

Processed under the lawful basis of Legal Obligation:

- We collect and process your personal information for producing invoices and accounting purposes which is required to meet HMRC legislation.
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- if you have given your consent.
- if it is necessary to enable the provision of third party services you have requested (for example to facilitate warranty, insurance or finance quotes or agreements).
- if we are under a duty to comply with any legal obligation.

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