

# **Towergold Limited – Privacy Policy**

Towergold Ltd takes your privacy seriously. This Privacy Policy explains how, where and why we collect information, what we do with it, who we share it with, how we protect your personal data and your rights.

## **Personal data we hold**

- Customer's name, address, telephone numbers and email.
- Vehicle details associated with the customer.
- Invoices relating to the customer's purchase and on-going maintenance of their vehicle(s).

## **How, where and why we collect personal data**

All our personal data is generated as part of the process relating to the sale or servicing of a vehicle that is associated with the customer. This data is provided by the customer as part of the "point of sale process" which is, traditionally, on a "face to face" basis. The customer orally provides such data which is documented on our Dealer Management System by a member of our staff who has access and training on our system.

Towergold Ltd does not buy or obtain, in any form whatsoever, personal data from other sources for marketing purposes.

When using our website, we may collect and process data supplied by you when completing our email communication form requesting us to contact you. Any new personal data provided as part of an inquiry, whether through our website or telephone, is stored temporarily on our Dealer Management System for communication purposes. Unless the personal data results in the purchase or the service of a vehicle (which require a face to face sale process) such data is deleted from our system.

Our reasons for collecting personal data are as follows:

- For invoices over a particular value, HMRC require that customer details (name and address) are documented on our invoice including the description of goods or services provided. The nature and value of the goods and services we provide usually fall within that category.
- For documenting and monitoring customers' entitlement to parts warranty, a service guarantee, or a mechanical breakdown warranty on a vehicle purchase.
- To respond to a request to contact the customer.
- Keeping customers informed of relevant servicing and MOT reminder dates thus ensuring the vehicle is safe, complies with statutory requirements and third party warranty stipulations.

- Maintain service history data for customer's vehicles to assist future work and provide historic information to a customer on their specific vehicle(s).
- To provide marketing material for products and services provided by Towergold Ltd only.

## **What we do with your personal data**

Personal data is strictly used for communicating with our customers for the purposes outlined above. Towergold Ltd does not provide personal data to any third party company for their marketing purposes.

## **The Lawful basis on which we use this information**

The lawful basis for processing are set out in Article 6 of the General Data Protection Regulation (GDPR). Towergold Ltd relies on both statutory and safety requirements as well as consent as the lawful basis for processing data. From the 25<sup>th</sup> of May 2018, all new and existing customers contacted or visiting our premises will be asked to complete an updated consent form regarding the use of their personal data.

## **Who we share it with**

We keep your information confidential and will only share your information outside of Towergold Ltd with:

- With our designated Finance Company. This only occurs where a customer has requested credit facility for the purchase of a vehicle from us. The process requires direct data input and authorisation by the customer at our trading premises. Towergold Ltd is an authorised credit broker.
- With a third party Warranty Company relating to the provision of mechanical breakdown warranty. On such occasions the customer would have indicated their consent by signing the service provision contract of the Warranty Company during the sale process.
- With government institutions for statutory road traffic compliance and taxation or any other purposes for which we are legally required to provide such information by law enforcement agencies or regulators.

## **Storing and securing personal data**

We hold data in line with our Data Protection Policy. We are committed to ensuring your information is secure with us. Personal data is stored on our server and only designated Towergold Ltd employees are permitted to access.

Personal data is reviewed periodically. Any inactivity in the last 6 years relating to a vehicle associated with the personal data results in the deletion of both data sets. The review and deletion is carried out by designated staff under the supervision of the Company Secretary.

## **Individual rights**

Under the Data Protection Act, you have a number of legal rights to control what we do with your data. Specifically, you have the right to:

- Request details of what information we have about you and receive a copy.
- Have inaccurate personal data rectified or completed if it is incomplete.
- Have your personal data erased.
- Have the right to request the restriction or suppression of your personal data.
- Object to decisions being taken by automated means.
- Object to processing of personal data that is likely to cause damage or distress.

To request details of your personal information and access to your vehicle records, simply contact us using one of the methods outlined below. Data can be provided in a commonly used machine readable form free of charge. You can exercise your rights either verbally or in writing. In order to prevent fraud, we may request identity confirmation.

You may contact us by post addressed to the Company Secretary, Towergold Ltd, Unit 10 Stockwell Works, Stephenson Way, Crawley, RH10 1TN or by email to [dinos@towergold.com](mailto:dinos@towergold.com), or by telephone on 020-8686-0212.

If you have any concern about the way we are collecting or using your personal data, we request you raise your concern with us in the first instance. We hope we can resolve any concerns, but if we don't you can contact the Information Commissioner's Office (ICO).

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