

Customer Facing Privacy
Notice for Inchcape Fleet
Solutions explaining how
Inchcape Fleet Solutions uses
your personal information

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1 Who we are

We are Inchcape Fleet Solutions Limited. Inchcape Fleet Solutions is registered in England & Wales with company number 837940 and has its registered office at First Floor, Unit 3140 Park Square, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN and principal place of business at Haven House, Compass Road, Portsmouth PO6 4RP.

Inchcape Fleet Solutions is authorised and regulated by the Financial Conduct Authority (number 311776).

We are also registered with the Information Commissioner's Office with the registration number Z566271X.

2 What is Personal Information?

Personal information is any information which we collect about you that can be used to identify you and is stored either electronically or in a manual filing system where personal data are accessible according to specific criteria.

Personal information will include any information, such as your name, address, IP address, vehicle registration number, that is collected about you by us for any reason, whether it is in connection with a purchase, by visiting our website or by contacting us.

It also includes any personal information that we may collect about you that is in the public domain, such as information made public on social media that is available to us when you connect with us on social media.

It is our intention to provide you with as much information as possible about what we do with that personal information, so that when you provide the personal information to us, you do so with an awareness of how it will be used.

3 Processor and Controller

3.1 Vehicle Leasing and Fleet Management Services provided to corporate customers:

Where we provide vehicle leasing and fleet management services to our corporate customers we are primarily processors of the personal data of those customers' drivers and employees. Where applicable, this means that the controller of this personal data is your employer and Inchcape Fleet Solutions is responsible for processing your personal data on their behalf. This means that your employer will need to provide you with a separate privacy notice informing you of how they will use your personal data.

In some cases though we will be the controller of your personal data and if so, this Privacy Notice will apply to our collection and use of your data.

We have set out in the table below a summary of the services we provide and whether we are controllers or processors of your personal data.

Service Provided	Controller or Processor
Provide finance to your employer for	Controller

vehicles	
Ordering and registering the vehicle	Processor
Communicating with your employer and you about servicing, maintaining and repairing your vehicle	Processor
Receiving breakdown or recovery assistance	Processor
Incident management if you or your vehicle are be involved and there is loss or damage to the vehicle	Processor
The administration of fines, penalties and endorsements	Processor
Risk management and driver license checking	Controller
Short term hires when you may need a relief or hire vehicle for a short period	Processor
Management of mileage recording, travelling abroad, fuel cards or other vehicle administration services	Processor
Obtaining feedback about the services for continuous improvement and reporting	Controller

3.2 Services provided to individuals

Where we provide you with personal contract hire services under our trading name, LeaseMyCar, we are acting as controllers and this Privacy Notice will apply to you.

Where we provide an individual with an opportunity to purchase a vehicle previously leased to their employer (or the employer of a friend or family member) we are acting as controllers and this privacy Notice will apply to you.

4 How we collect your personal information and why

Inchcape Fleet Solutions (**we, us, our, Inchcape**) will need to collect personal information about you, and there are different ways that we might do so; this privacy notice tells you what to expect when we collect personal information:

- (a) from visits to our websites, <http://www.inchcape-fleet.co.uk> or <https://www.leasemycar.net>;
- (b) using our driver portals (or those operated by our suppliers);
- (c) directly via post, email or telephone;

- (d) when you respond to our surveys, enter competitions or respond to promotions;
- (e) from our suppliers (such as when they deliver or collect a vehicle, service, maintain or repair your vehicle or provide breakdown assistance);
- (f) through social media;
- (g) from anyone referred to us from enquiries made of our Inchcape Retail sister company or one of our brand partners (via their websites or otherwise);
- (h) from anyone who contacts us;
- (i) from anyone who purchases or leases a vehicle;
- (j) from anyone who uses our vehicle leasing, fleet management, risk management service and maintenance services;
- (k) from anyone who subscribes to our marketing;
- (l) from other third parties (such as the DVLA, legal, government or enforcement agencies or insurance providers);
- (m) from your employer when they instruct us to contact you in relation to their company vehicle scheme or other company requirement (such as checking your driving licence);
- (n) from you when you contact us (or via a recruitment agent) when you wish to apply for a vacancy. Although please note that we do provide a separate Privacy Notice to employees and candidates (available upon request).

4.1 Visitors to our websites

4.1.1 Our websites

Our website is managed by Rhino Design (Manchester) Ltd. As part of the service provided by Rhino Design (Manchester)Ltd, they will help to maintain the security and the performance of our website by (i) encrypting data in transit and protecting user connections (ii) using third party scanning services to scan against known web attacks (iii) investigating site errors internally and (iv) providing secure hosting services through Amazon Web Services. Rhino Design's privacy notice can be found at <http://rhinodesign.co.uk/privacy-policy>

4.1.2 Third party services

Whenever you visit our websites, we will use a third party service, Google Analytics, to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we use this service is that it is within our legitimate interests to find out how many people visit the website and the various parts of the website it improves the service provided to you and improves the customer experience. This information helps us to find out how our website is

working and how to improve it. We do not identify anyone, and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our website.

We have YouTube video content embedded on our website. YouTube controls any information that is collected by viewing their content. YouTube's privacy policy can be located at <https://www.google.co.uk/intl/en-GB/policies/privacy/>.

4.1.3 Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our website for our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our website, which allows us to provide you a better experience and also allows us to improve our website.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies. However, if you do block cookies there may be parts of our website that you will be unable to access or that will not function properly.

We use the following types of cookies on www.inchcape-fleet.co.uk:

(a) Analytical/performance cookies.

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.

Analytical/performance cookies			
Site Region	Cookie Name	Expiry	Description
UK & Worldwide	_gat	1 min	This cookie name is associated with Google Universal Analytics, according to documentation it is used to throttle the request rate - limiting the collection of data on high traffic sites. The main purpose of this cookie is: Performance
UK & Worldwide	_gid	24 Hours	This cookie name is associated with Google Universal Analytics. This appears to be a new cookie and as of Spring 2017 no information is available from Google. It appears to store and update a unique value for each page visited. The main purpose of this cookie is: Performance

UK & Worldwide	–ga	2 years	<p>This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. By default it is set to expire after 2 years, although this is customisable by website owners.</p> <p>The main purpose of this cookie is: Performance</p>
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We use the following types of cookies on www.leasemycar.net:

(a) Strictly necessary cookies.

These are cookies that are essential for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Strictly necessary cookies			
Site Region	Cookie Name	Expiry	Description
UK	ASP.NET_SessionId	At end of visit	General purpose platform session cookie, used by sites written with Microsoft .NET based technologies. Used to maintain an anonymised user session by the server. Used by the website to serve the correct data to the site visitor.

(b) Analytical/performance cookies.

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.

Analytical/performance cookies			
Site Region	Cookie Name	Expiry	Description
UK	_ga_id, _gid	2 years	Google Analytics cookies that allows us to recognise and count the number of visitors and to see how visitors move around our website

4.2 Social media

Any information you provide to us via social media (including messaging, "liking", "following" and other communications) is controlled by the social media network.

Our websites may contain links to social media pages. We currently use:

- Twitter;
- Facebook;
- LinkedIn;
- Instagram;

We recommend that you visit their websites and read their privacy notices and contact them directly if you have any concerns regarding their use of your personal information.

4.3 Contacting us

Our website provides you with different ways to contact us. All communications are handled, reviewed and responded to internally by us.

Calls made to our dedicated customer helpdesks will be recorded. It is within our legitimate interests to record such calls for training, monitoring and quality purposes. The call recording system, 'Redbox', is operated by Inchcape Fleet Solutions and supported by Maintel. Maintel privacy information can be found on <http://www.maintel.co.uk/legal>. The data is stored and hosted on Inchcape Fleet Solutions' own servers in the UK. Call data will be retained for up to 7 years before being deleted.

Please note, however, that email monitoring or blocking software may also be used and that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

As part of communicating with us, you will also submit personal information about you that we require in our legitimate interest. This includes your name, address and additional contact details.

Any personal information that is provided in and during communications is used only for the purpose of reviewing the communications and conducting the ongoing administration and management of communications. We will not use your personal information in an identifiable manner in any publication without your further explicit consent.

We will delete this personal data when we reasonably consider that we no longer need it for this purpose.

Please note that we may need to contact you about the application through post, email or telephone. Please can you make sure that you keep us updated of any changes to your contact details.

4.4 Personal information collected when you lease a vehicle

When you lease a vehicle using our personal contract hire scheme, LeaseMyCar, we will need to collect information from you relating to your lease.

When your employer leases a vehicle using our corporate vehicle leasing scheme we may collect or be provided with information about you relating to the vehicle that your employer is leasing and wishes you to drive (or, if you are a company director, information about you which is required by our funders to progress an application for vehicle finance).

We may also hold personal information related to your lease in a hard copy file in a secure physical filing system, at our principal trading address or at a secure document archiving facility.

All electronic and hard copy files will be destroyed 7 years after the expiry or termination of the lease.

This personal information includes your name, address, vehicle information, credit worthiness, salary details, other financial information (where applicable to making a credit application or paying any administration fees, deposits or any charges due during or after the period of the lease), employment history and payment details, which are a contractual necessity without which we cannot proceed with your lease. If you are leasing a vehicle on behalf of a business but are not the business owner we may also collect this information about the business owner. We will also collect your name, address (if different), contact details, email, business name (if applicable) and the number of vehicles, operating locations and employees. It is in our legitimate interests to collect this additional information in order to manage and administer your lease and our relationship with you; for example, we may call you to let you know that your lease vehicle is ready to be delivered and therefore deliver to the appropriate operating location.

We process information relating to your finance application on behalf of Inchcape Fleet Solutions' finance providers, who are acting as a data controller. Please refer to Section 4 below for further details of our finance providers where we are permitted to disclose them.

Your personal data may be shared with financial services organisations, such as companies which provide hire-purchase funding and banks providing such funding. This is for the purpose of securing such funding on your behalf. We may provide personal data to enable such financial services organisations to carry out necessary searches in order to enable them to make a funding decision for you and meeting their legal and regulatory requirements.

If you are a Director of our corporate customer then we may send your identity and contact data to our funders so that they may complete a credit and fraud check as applicable.

In addition, these funders may share your data within their group of companies who provide services to them and so that they and any other companies in their group can look after your relationship with us and them

4.5 Personal information collected when you purchase a vehicle

When you purchase a vehicle, we will need to collect information from you relating to your purchase.

We may also hold personal information related to your purchase in a hard copy file in a secure physical filing system, at our principal trading address or at a secure document archiving facility.

All electronic and hard copy files will be destroyed after 7 years unless we have grounds for retaining the information for longer (such as to comply with any applicable legal obligations).

Without Finance

This personal information includes your name, address, vehicle information and payment details, which are a contractual necessity without which we cannot proceed with your purchase. If you are purchasing on behalf of a business but are not the business owner we may also collect this information about the business owner. We will also collect your name, address (if different), contact details, email, business name (if applicable) and the number of vehicles, operating locations and employees. It is in our legitimate interests to collect this additional information in order to manage and administer your lease and our relationship with you; for example, we may call you to let you know that your lease vehicle is ready to be delivered and therefore deliver to the appropriate operating location.

With Finance

This personal information includes your name, address, vehicle information, credit worthiness, salary details, other financial information (where applicable to making a credit application or paying any administration fees, deposits or any charges due during or after the period of the lease), employment history and payment details, which are a contractual necessity without which we cannot proceed with your purchase. If you are purchasing on behalf of a business but are not the business owner we will also collect this information about the owner. We will also collect your name (if applicable) and the number of vehicles, operating locations and employees. It is in our legitimate interests to collect this additional information in order to manage and administer your purchase and our relationship with you; for example, we may call you to let you know that your vehicle is ready to be delivered and therefore deliver to the appropriate operating location.

We process information relating to your finance application on behalf of Inchcape Fleet Solutions' finance providers, who are acting as a data controller. Please refer to Section 4 below for further details of our finance providers where we are permitted to disclose them.

4.6 Vehicle related services, including service, maintenance, repair, breakdown assistance, vehicle recoveries, relief or hire vehicles and risk management and driver training services

You may also contact us for us to arrange to have your vehicle serviced, maintained or repaired, to organise breakdown assistance or vehicle recoveries or to arrange for a relief or hire vehicle for you and in relation to risk management or driver training services. We will process your personal data when you do.

We will collect yours and (if different) the vehicle owner's name and address, the vehicle registration number and your payment details (if applicable) as a contractual necessity in order to provide you with a service. If you do not provide these details, we will not be able to provide you with our services.

We will also collect your contact details, date of birth, gender, marital status, identifiers issued by public bodies (e.g. Driving License Number), email address, the business name (if applicable), number of vehicles, your operating locations and number of employees. If you are not the business owner, we will also collect the name and contact details of the business owner, and it will be your responsibility to ensure that such person is provided with a copy of this notice. It is in our legitimate interests to collect this information in order to tailor the service

we provide; for example, to call you to give you an update on the progress of the service or on the arrival of an ordered part.

4.7 Subscribing to our marketing

If you are a consumer customer (as opposed to a business customer), or have made an enquiry into our products or services, we will provide you with a clear choice to consent to receiving marketing promotional material, updates, reminders and communications by giving you an opt-in to receiving such communications. If you have provided your consent we will collect your contact details (name, postal address and email address) and vehicle details (make and model) to provide you with such communications. You have the right to withdraw your consent at any time. For full details on how to withdraw consent please see below.

Different rules may apply regarding marketing for business to business purposes (such as sending marketing emails to corporate email addresses). However, under the GDPR we are obliged to respect an individual's right to object to processing and if we receive notice that an individual wishes us to stop sending business marketing communications to an email address which contains their personal information (such as name.surname@ifs.inchcape.co.uk) then we will respect that request and no longer send any marketing communications to that individual's corporate email address.

We will collect your personal information, in an electronic form when you use one of our online portals, via our websites or over the telephone. All electronic files are stored on our management system (Kestrel) or in Salesforce. The Kestrel system is provided, maintained and hosted by CDK Global (UK) Limited in the United Kingdom. CDK is a provider of industry standard software solutions and a copy of its privacy notices can be found at <http://www.cdkglobal.co.uk/privacy-policy>. Salesforce is a provider of industry standard Customer Relationship Management software and a copy of its privacy notices may be found at <https://www.salesforce.com/uk/company/privacy/>. Our Salesforce data is stored within the European Economic Area. We also collect your personal information in an electronic form on the LeaseMyCar website. This system designed, developed and managed by our in-house web development team and is stored within the United Kingdom.

If you ever decide you no longer wish to receive our marketing communications, you opt out at any time by unsubscribing from the mailing list, using the link provided in the marketing communications email, or by using the contact details below. If you do unsubscribe, please note that we will still keep your details in our system marked as 'denied' so that we can make sure that you do not receive our marketing communications again in the future.

Different rules may apply regarding marketing for business to business purposes (such as sending marketing emails to corporate email addresses). However, under the GDPR we are obliged to respect an individual's right to object to processing and if we receive notice that an individual wishes us to stop sending business marketing communications to an email address which contains their personal information (such as name.surname@ifs.inchcape.co.uk) then we will respect that request and no longer send any marketing communications to that individual's corporate email address.

4.8 Applying for a job with us

If you wish to search for or apply for a job with Inchcape Fleet Solutions you are normally directed to a website page operated by our sister company, Inchcape

Retail Limited. Inchcape Retail Limited's Privacy Notice is here: <https://www.inchcape.co.uk/privacy-policy/>. There may be third parties involved in the application process, such as recruitment agencies or job recruitment websites. They will have their own Privacy Notices and we advise you to visit their websites to check how they will use your personal data too. When a candidate applies for a role with Inchcape Fleet Solutions and indeed, if they are successful, we have specific Privacy Notice for employees and candidates which we will provide you with upon request.

5 Your data and third parties

We do use third parties to provide services to us from time to time; therefore, we will need to share data with them that it is in our legitimate interests for business administrative needs. A list of the categories of third parties that we use and how they process personal information is set out in the table below. For a full list of our third party suppliers, please contact us at dataprotection@ifs.inchcape.co.uk.

<u>Third Party</u>	<u>What Data</u>	<u>Why do we share this data</u>
Original Equipment Manufacturers	Name, address, email address, phone number, vehicle and all vehicle purchase and services purchase details	Sales, aftercare / aftersales, insurance of warranty cover, marketing, customer relationship management, vehicle safety
Third party consultants of Inchcape Fleet Solutions	Name, address, email address, all vehicle purchase and services purchase details	Consultancy services on all areas of Inchcape Fleet Solutions' business
IT Systems and Software Providers (including those used for marketing)	Name, address, telephone numbers, email address, vehicle information, driving licence number, age and date of birth, financial information, employment information, delivery details, voice recordings (data subject voice), gender, IP address and other online identifiers	Website and portal management, customer enquiry management and delivery, customer relationship management, customer accounts, online booking management, optional surveys, to book delivery / services with agent, telephony and call recording services
Accident Management Service Providers	Name, email address, VRN, driving licence number, any driving licence penalties /	Accident management, administration of insurance claims, recovery of insured and uninsured losses, legal claims

	speeding fines, IP address, age (and DOB), home address, phone numbers, voice recordings (data subject voice), gender, vehicle data and insurance information (where applicable), details of medical or health issues (following an accident)	
Third party service, maintenance and repair providers	Name, address, email address, telephone number, vehicle data and insurance information (where applicable)	Aftercare, Service, Maintenance and Repairs and accident management repairs
Enforcement Authorities	Name, address, email address, phone number, vehicle details, employer details,	Administration of fines and penalties incurred whilst driving a vehicle
Marketing Providers	Name, address, email address, phone number, vehicle details, information about visitors activity on the website including their IP address and their telephone number when they call the company	Marketing and marketing analytics, customer feedback services
Funding Providers	Name, title, address, email address, phone number, date of birth, age, sex, indentifiers issued by public bodies (e.g. Social Security / National Insurance, Passport number), marital history / status, salary, family and household members, housing status (e.g. privately owned, rented, living with parents),	Sales, finance, insurance or warranty cover

	<p>employment and career history, employment termination details, income, payments, loans or grants, insurance.</p>	
<p>Vehicle Movements, Disposals and Re-marketing</p>	<p>For auction customers: vehicle details only. For logistics customers: data in relation to collection/delivery and also the inspection if applicable. This includes, but is not limited to, the vehicle registration details, the name and address of the collection point, the name and address of the delivery point, and any other contact details which would assist in completing the job at hand.</p>	<p>Auction services, remarketing services, vehicle logistics, inspection and collection</p>
<p>Risk Management and Driver Training Providers</p>	<p>Name, address, email address, phone number, employer, vehicle information, insurance information, details of medical or health issues (where it affects provision of a driving licence), driving related convictions and offences (including information about any driving-related endorsements, criminal convictions, fines and traffic offences)</p>	
<p>Vehicle Breakdown Assistance and Recoveries Providers</p>	<p>Name, address, email address, telephone number, employer,</p>	

	vehicle data and insurance information (where applicable)	
Relief and Hire Vehicle Providers	Name, address, email address, telephone number, employer, vehicle data and insurance information (where applicable)	
Tyre and Glass Providers	Name, address, email address, telephone number, employer, vehicle data and insurance information (where applicable)	
Facilities and Security Providers	Name, address, contact information, vehicle data and insurance information (where applicable) images and video footage, voice recordings	CCTV, secure document destruction, building access control

6 Disclosure of personal information

We will not usually disclose your personal information other than as already explained in Section 4 and 5 above. However, there may be circumstances where we need to share personal information other than as anticipated in **Section 4** and 5 above. These include:

- 6.1.1 where we are legally required to disclose the information. This includes sharing the personal information with tax authorities and law enforcement agencies for the purposes of the prevention and detection of fraud and crime;
- 6.1.2 where we need to disclose the personal information for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;
- 6.1.3 disclosure is required to protect the our interests, or someone else's interests (for example, to prevent fraud);
- 6.1.4 disclosure is necessary to protect your vital interests (for example if you are unwell at our premises, we may need to seek medical assistance);
- 6.1.5 it is to a third party for the purposes of providing administrative or processing services on our behalf. If such disclosure is required we will

take steps to ensure that the third party protects the personal information in the same way that we do and notify you of any changes to this privacy notice; and

6.1.6 to any prospective purchaser of our business assets or organisation.

7 Keeping personal information secure

We know that you provide your personal information in good faith and expect it to be looked after. This is why we take the security of your personal information seriously. This means that we have taken steps internally in order to ensure that our systems adequately protect your personal information. This includes:

- (a) locating all personal information that we control on internal servers located in the United Kingdom;
- (b) ensuring strict access controls on a need to know basis;
- (c) monitoring access to the personal information (physically and to our systems);
- (d) having an information security function and an Information Security Management System that has been ratified and approved by the Board of directors;
- (e) use of industry-standard anti-virus and firewall protections;
- (f) encrypting data on all company laptops and mobile phones; and
- (g) regularly monitoring our systems to ensure the security of data.

8 Your rights

You have rights in respect of your personal information and this Section explains a bit more about those rights that are applicable to what we do with your personal information and when you can exercise them. If you would like more information about any of your rights, please contact us on the details set out in Section 11.

8.1 Withdrawing consent

Where we have relied on consent as a legitimate reason to process your data and you have explicitly consented to us processing your personal data or to any special categories of data, you can object to and withdraw consent to our processing the special categories of data at any time. If you wish to withdraw consent, please do so by sending your request in writing to us at our contact address in Section 11.

8.2 Accessing your personal information

We want you to fully understand and be comfortable with how we use your personal information. You can contact us at any time to ask whether we process any personal information about you. If we do hold or use your personal information in any way, you have the right to access that personal information. All we ask is that:

- 8.2.1 you make your request to access in writing to the contact details below;
- 8.2.2 you verify your identity; and

- 8.2.3 you are fair and reasonable with how often you make this kind of request.

Please allow us up to one month from receipt of your request in order to provide a response. If your request is complex or there are a number of requests from you it may take us longer, but in any event we will respond within two months.

Please be aware that the majority of these rights may only be requested from the data controller. We may therefore require you to contact the data controller (which may be your employer) and they will liaise with us to reply to your request. If you have requested these rights, and we are the data controller, we will also work with our third party suppliers to ensure they are aware of your decisions.

There is no fee for exercising these rights unless your request is clearly unfounded, repetitive or excessive (and then we can charge you a reasonable fee). If it is clearly unfounded, repetitive or excessive we may refuse your request. If we do, you may complain to the Information Commissioner's Office (ICO).

8.3 Requesting more information

We hope that you can understand that it is very difficult to cover all the possible ways in which we collect and use personal information. We have tried to be as clear and as open as we can and will continue to update this privacy notice as our use of personal information develops. However, if you have any questions regarding our use of your personal information, we will be happy to give you peace of mind by answering any questions or providing any additional information that we can. If you do have any specific questions, or need anything explaining, please get in touch on the contact details in Section 11.

8.4 Additional rights

You also have some additional rights that you may exercise as set out here. We may publish a policy, from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will provide a link to it here. In each instance we may ask you to make your request in writing to the contact addresses in Section 11 and provide verification of your identity.

- 8.4.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address)
- 8.4.2 You have the right to request that we erase your personal information. Please be aware that we can only comply with such a request if
- (a) your personal information is no longer required for the purposes it was collected for (for example, we need your personal information to respond to a communication);
 - (b) the collection, storage or use of the personal information by us is prevented by law;
 - (c) your personal information is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings.

- 8.4.3 You have the right to request that we restrict or refrain from processing your personal information:
- (a) for the time it takes us to verify the accuracy of your personal information where you have disputed its accuracy;
 - (b) where the collection, storage or use of the personal information by us is unlawful but you decide not to ask for erasure;
 - (c) where, we no longer need your personal information but you need them for the purposes of establishing, exercising or defending a legal claim;
 - (d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal information, where you have exercised your right to object to processing.
- 8.4.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.
- 8.4.5 You have the right to object to our use of your personal information:
- (a) where we are using that information based on our legitimate interests, and where we do not have compelling overriding grounds to continue to use your personal information; or
 - (b) at any time, where we use your personal information to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose, but may use it for another lawful purpose.

9 Complaints

You are important to us, and so is protecting your personal information. We have high standards when it comes to collecting and using personal information. For this reason, we take any complaints we receive from you about our use of your personal information very seriously and request that you bring any issues to our attention.

Where you are communicating with us for the purpose of making a complaint, we will only use your personal information to handle, investigate and respond to the complaint and to check on the level of service we provide. Where the complaint is about a member of our team, we may have to disclose your identity to whoever the complaint is about. You may let us know that you don't want information that identifies you to be disclosed and we will try to respect your request; however, it may not be always possible to handle a complaint on an anonymous basis.

If you are unhappy, you can also contact the Information Commissioner's office to make a complaint directly.

10 Updating this privacy notice

We keep our privacy notice under regular review in order to ensure that it properly reflects our use of personal information. This privacy notice was last updated on 21 May 2018.

11 How to contact us

You can contact us by:

11.1 **Post:** Haven House, Compass Road, Portsmouth PO6 4RP

11.2 **Email:** dataprotection@ifs.inchcape.co.uk

11.3 **Telephone:** 023 9231 0844