

# BURROWS MOTOR COMPANY LIMITED – PRIVACY POLICY

## Introduction

Burrows Motor Company Limited takes its obligations concerning data protection seriously and will only use your personal information to supply vehicles, goods and services to you and to administer your account. This policy describes in detail how we will use your personal information and how you can exercise your rights with respect to your personal information. On every occasion we update our Privacy Policy, we will post the updated policy on our websites so that you can always be aware of what personal information we collect, how we use it and under what circumstances we disclose it with other parties.

## About Us

Burrows Motor Company Limited is a privately owned automotive company that sells new and used motor vehicles, new and used commercial vehicles, services and MoT's cars and vans, supplies parts to both retail, commercial and trade customers, organises and manages the repair of accident damaged vehicles for individuals, motor insurance companies and fleet providers. We work with contracted specialists and vehicle manufacturers that supply the vehicles, parts, paint, materials and services to enable the sale, maintenance and repair of our vehicle.

In this Privacy Policy and reference to **we, us or our** means Burrows Motor Company Ltd. Any reference to **you or your** means the person whose personal information we collect, use and process. Any references to a **website** means any website owned and operated by, or on behalf of, Burrows Motor Company Ltd.

## What information do we collect and process?

In order for us to sell, maintain or repair your vehicle it is legitimate and necessary to receive from your insurer, fleet manager, company, or from yourself necessary personal data. "Personal Data" is information about you which, either on its own or when connected with other data, allows us to identify you as an individual customer to provide you with our services. The personal data we hold may include the following:

- Information collected through forms completed both in our dealership, on our website or by speaking with an ambassador at any outside exhibition
- A copy of your driving licence when you test drive one of our vehicles or drive a courtesy car
- When you enquire or purchase goods/services we collect personal information to respond to your enquiry and fulfil your purchase.
- Details of transactions you have processed with us, including the purchase of vehicles/goods and services offered by Burrows Motor Company Ltd
- CCTV footage of you when you visited our premises
- Information contained in and records of communication between us, including emails, text messages, letters and recorded phone calls.
- Details of your visits to our websites, including but not limited to, traffic data, location data, IP address and the resources that you access.
- Your marketing preferences
- We also collect information to enable third parties to carry our credit reference checks on you (if you are purchasing a vehicle on finance) and we will process information about the result of those checks to complete your purchase.

- We will collect information relevant to the insurance products that we sell that are provided by third parties

If you provide us with another person's personal information you must ensure beforehand that you have their agreement to do so and that they are aware of the ways in which we use personal information as set out within the Privacy Policy.

### **Processing personal information**

We use your personal information in relation to our business activities. In particular, we may use your personal information in the following ways:

- To respond to your queries regarding the possible purchase of goods or services
- To carry out our obligations arising from the purchase of goods and/or provision of services, and to respond to queries from you regarding those contracts
- To obtain feedback from you regarding us
- To provide you with reminders regarding your vehicle, including, for example, when your vehicle is due to have a service, MoT or work undertaken
- To notify you about changes to our service and to otherwise communicate with you
- To provide you with information about vehicles, services, promotions and offers that may be of interest to you

We may lawfully process your personal data under one of three options.

1. Consent. In circumstances where you have provided us with a freely given, informed and specific choice to allow Burrows Motor Company Limited to process your data, consent will be the lawful basis under which we process your data.
2. Contractual: If you have entered into, or are in the process of entering into a contract with Burrows Motor Company Ltd, your personal data may be processed if it is necessary for performance of the contract
3. Legitimate interest: If you have completed or negotiated a sale for goods or services with Burrows Motor Company Ltd, you may have your data processed for the purposes of the legitimate interests of Burrows Motor Company Limited, or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data

To ensure your fundamental rights and freedoms with Burrows Motor Company Ltd's legitimate commercial interests, you will be informed that you may receive marketing communications for similar products and services and will be given the ability to opt-out of further processing at any subsequent point in the relationship. This opt-out will be included on any digital marketing that is sent out, or you may call into any Burrows Motor Company Limited's dealerships or call any centre to record your opt-out decision. You may also e-mail your opt-out to [dataprotection@burrowsmotorcompany.co.uk](mailto:dataprotection@burrowsmotorcompany.co.uk)

## **Sharing your personal data**

We may share your personal information with third parties in connection with our business activities, including in the following circumstances:

We may pass your personal information to a third-party finance company for the purposes of them providing you with finance. These organisations may carry out credit checks and may disclose your data to credit reference agencies for that purpose.

We will pass your personal information to a third-party provider of insurance products that we offer in the event that you take up the option of purchasing one of these products.

In the event that we purchase, or sell, any business we may disclose personal information held by us about our customers to the prospective seller, or buyer, of such business. If we, or substantially, all of our assets are acquired by a third party, personal data held by us about our customers will be unique of the transferred assets.

We may pass your personal information to third party organisations that provide services to us, including assisting us with our marketing activities.

We may pass your personal information to third parties if under a legal duty to disclose or share your information in order to comply with any legal obligation, including in connection with any crime or criminal activity.

## **Protecting your personal information**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We store all the personal information you provide on our secure servers. All electronic transactions you make to or receive from us will be encrypted using SSL technology.

Data transmission over the Internet is inherently insecure and we cannot guarantee the security of data sent over the Internet. You are responsible for keeping your password and user details confidential and we will never ask you for your password.

Your personal information will not be transferred to, stored or otherwise processed outside the EU. Our data minimisation policy limits information to what is necessary for the purposes for which they are processed. International transfers of data between any of the countries we operate in is limited to operational and financial information. Personal information is not transferred.

## **What rights do you have to amend personal information?**

You have the right to review the personal data held by us and have inaccurate information about you corrected. To understand more about our data processing activities or to request access to your personal information, please contact our customer support team or email [info@burrowsmotorcompany.co.uk](mailto:info@burrowsmotorcompany.co.uk)

## **What if you want us to stop using your personal information?**

You have the right to object to our use of your personal information, or to ask us to delete, remove, or to stop using your personal information if there is no need for us to keep it. This is known as the 'right of erasure' or the 'right to be forgotten'. There may be legal, warranty related or other reasons why we need to keep or use your data, but please tell us if you think that we should not be using it.

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

Burrows Motor Company will keep your details on record for as long as it is necessary to meet record keeping requirements. We hold booking, invoice and email details for seven years from last contact with you. They are then deleted in accordance with data protection and other applicable legislation. Should you wish to make a warranty claim after this period, you will need to provide a copy of our invoice or our completed guarantee.

## **Website and Cookies**

Our Burrows Motor Company Ltd website is powered by G-Forces Web Management Limited ("GForces"), our third party web services provider. GForces is committed to ensuring that data is processed in accordance with applicable data privacy laws, and is kept secure. GForces is certified to the standard of ISO27001 (an international standard for information security). GForces uses Amazon Web Services, Inc. as its cloud platform provider. All data processed by GForces is stored on Amazon's web servers in the EEA.

## **If you visit our website**

When someone visits our website, GForces collects standard internet log information (your IP address, browser, and type of device) and details of visitor behaviour patterns (where you joined our site from, the path you take through our site and where you leave). These are stored against unique ids (which are strings of numbers). GForces collects this information for the legitimate business purpose of monitoring the number of visitors to the various parts of the site, the general geographic location of visitors and engagement levels, which in turn enables it to make improvements to its websites and services, and provide business intelligence. This information is only processed in a way which does not identify anyone. It is kept indefinitely.

GForces also uses Google Analytics to collect standard internet log information and details of visitor behaviour patterns, which are stored against unique ids (i.e. strings of numbers). We collect this information for the legitimate business purpose of monitoring website traffic and engagement levels, which in turn enables us to make improvements to our website and the way we sell our cars and services. This information is only processed in a way which does not identify anyone. It is kept indefinitely.

## **If you use our enquiry forms**

When you submit information using an online form, GForces processes the data collected and stores it for 31 days for the legitimate business purpose of enabling us to access the

information and deal with your request (it is then kept for a further 14 days in GForces' routine back-ups for business continuity purposes). We collect the following information:

- Information about your computer and about your visits to and use of our website, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views.
- Information relating to any transactions carried out between you and us on or in relation to our website, including information relating to any purchases you make of our goods and services.
- Information that you provide to us for the purpose of registering with us.
- Information that you provide to us for the purpose of subscribing to our website services, email notifications and / or newsletters.
- Any other information that you choose to send us
- Information about your computer and about your visits to and use of our website, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views.
- Information relating to any transactions carried out between you and us on or in relation to our website, including information relating to any purchases you make of our goods and services.
- Information that you provide to us for the purpose of registering with us.
- Information that you provide to us for the purpose of subscribing to our website services, email notifications and / or newsletters.
- Any other information that you choose to send us

Personal information submitted on this website will be used for the purposes specified in this privacy notice or in relevant parts of our website. We may use your personal information to:

- Administer our website
- Improve your browsing experience by personalising the website
- Enable your use of the services available on our website
- Send you general (non-marketing) commercial communications
- Send you email notifications which you have specifically requested
- Where you have specifically given consent for us to do so, send to you our newsletter and other marketing communications (relating to our business [or the businesses of carefully-selected third parties]) which we think may be of interest to you, by post, by email or similar technology. You can inform us at any time if you no longer require marketing communications to be sent by emailing us at [info@burrowsmotorcompany.co.uk](mailto:info@burrowsmotorcompany.co.uk)
- Provide third parties with statistical information about our users without identifying any individual user
- Deal with any enquiries and complaints made by or about you relating to the website
- Administer our website
- Improve your browsing experience by personalising the website
- Enable your use of the services available on our website
- Send you general (non-marketing) commercial communications
- Send you email notifications which you have specifically requested
- Where you have specifically given consent for us to do so, send to you our newsletter and other marketing communications (relating to our business [or the businesses of carefully-selected third parties]) which we think may be of interest to you, by post, by email or similar technology. You can inform us at any time if you no longer require marketing communications to be sent by emailing us at [info@burrowsmotorcompany.co.uk](mailto:info@burrowsmotorcompany.co.uk)
- Provide third parties with statistical information about our users without identifying any individual user
- Deal with any enquiries and complaints made by or about you relating to the website

## Force24 Cookies & Tracking

Our organisation utilises Force24's marketing automation platform.

Force24 cookies are first party cookies and are enabled at the point of cookie acceptance on this website. The cookies are named below:

- F24\_autolD
- F24\_personID

They allow us to understand our audience engagement thus allowing better optimisation of marketing activity.

**f24\_autolD** – This is a temporary identifier on a local machine or phone browser that helps us track anonymous information to be later married up with f24\_personid. If this is left anonymous it will be deleted after 6 months . Non-essential, first party, 10 years, persistent.

**f24\_personid** – This is an ID generated per individual contact in the Force24 system to be able to track behaviour and form submissions into the Force24 system from outside sources per user. This is used for personalisation and ability to segment decisions for further communications. Non-essential, first party, 10 years, persistent.

The information stored by Force24 cookies remains anonymous until:

- Our website is visited via clicking from an email or SMS message, sent via the Force24 platform and cookies are accepted on the website.
- A user of the website completes a form containing email address from either our website or our Force24 landing pages.

The Force24 cookies will remain on a device for 10 years unless they are deleted.

## Other Tracking

We also use similar technologies including tracking pixels and link tracking to monitor your viewing activities

We use a third party provider, Gubagoo Inc. to supply and support our LiveChat service. If you use the LiveChat service we will collect your name and email address if you provide this, and any other personal information that you volunteer to us. This is used for the legitimate business purpose of handling customer enquiries in real time and then following up. This data is stored by Gubagoo for 2 years to enable us to access the information and deal with your enquiry. Gubagoo stores the information in the US under the EU-US PRIVACY SHIELD FRAMEWORK. Please see Gubagoo's privacy policy for more information on how they use your data.

<https://www.gubagoo.com/about/policy>

Our Burrows Mint Cars website is powered by Roger Burnett Racing Ltd, trading as RBP, our third party web services provider. RBP is committed to ensuring that data is processed in accordance with applicable data privacy laws, and is kept secure.

## Other Tracking

We also use similar technologies including tracking pixels and link tracking to monitor your viewing activities

### **Device & browser type and open statistics**

All emails have a tracking pixel (a tiny invisible image) with a query string in the URL. Within the URL we have user details to identify who opened an email for statistical purposes.

### **Link Tracking**

All links within emails and SMS messages sent from the Force24 platform contain a unique tracking reference, this reference help us identify who clicked an email for statistical purposes.

### **Burrows Mint Cars**

When someone visits our website, RBP collects standard internet log information (your IP address, browser, and type of device) and details of visitor behaviour patterns (where you joined our site from, the path you take through our site and where you leave). These are stored against unique ids (which are strings of numbers). RBP collects this information for the legitimate business purpose of monitoring the number of visitors to the various parts of the site, the general geographic location of visitors and engagement levels, which in turn enables it to make improvements to its websites and services, and provide business intelligence. This information is only processed in a way which does not identify anyone. It is kept indefinitely.

RBP also uses Google Analytics to collect standard internet log information and details of visitor behaviour patterns, which are stored against unique ids (i.e. strings of numbers). We collect this information for the legitimate business purpose of monitoring website traffic and engagement levels, which in turn enables us to make improvements to our website and the way we sell our cars and services. This information is only processed in a way which does not identify anyone. It is kept indefinitely.

### **If you use our enquiry forms**

When you submit information using an online form, RBP processes the data collected and stores it for 31 days for the legitimate business purpose of enabling us to access the information and deal with your request (it is then kept for a further 14 days in RBP's routine back-ups for business continuity purposes). We collect the following information:

Personal information submitted on this website will be used for the purposes specified in this privacy notice or in relevant parts of our website. We may use your personal information to:

Burrows Motor Company will store your information on their Dealer Diary system for as long as legitimately required to complete the service/transaction you have requested.

Our may website contains links to other websites. We are not responsible for the privacy notices, policies or practices of third party websites. Please visit the third party website if you wish to view their privacy notice / policy.

We will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing. Except as provided in this privacy notice, we will not provide your information to third parties.

We use cookies on our website. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server, which enables the web server to identify and track the web browser.

We may send a cookie, which may be stored on your browser on your computer's hard drive. We may use the information we obtain from the cookie in the administration of our website, to improve the website's usability and for marketing purposes. We may also use that information to recognise your computer when you visit our website, and to personalise our website for you.

Most browsers allow you to refuse to accept cookies. For example, in Internet Explorer you can refuse all cookies by clicking 'Tools', 'Internet Options', 'Privacy', and selecting 'Block all Cookies' using the sliding selector. However, this will have a negative impact upon the usability of many websites, including ours.

We use Google Analytics to analyse the use of our website. Google Analytics generates statistical and other information about website use by means of cookies which are stored on user's computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information and their privacy policy is available at: <http://www.google.com/privacypolicy.html>

## **Other Tracking**

We also use similar technologies including tracking pixels and link tracking to monitor your viewing activities

## **Device & browser type and open statistics**

All emails have a tracking pixel (a tiny invisible image) with a query string in the URL. Within the URL we have user details to identify who opened an email for statistical purposes.

## **Contact Us**

If you have any questions about this privacy notice or our treatment of your personal information, please write to us by email at [info@burrowsmotorcompany.co.uk](mailto:info@burrowsmotorcompany.co.uk) or by post to The Data Protection Officer, Burrows Motor Company, Quest Park, Wheatley Hall Road, Doncaster DN2 4LT.

## **Changes to this Privacy Notice**

The Data Privacy laws changed on 25 May 2018. Burrows Motor Company may change this Privacy Notice from time to time in order to reflect changes in the law. This version was updated in November 2022.



