Group 1 Automotive Online Privacy Policy

• The terms below govern your use of Group 1 Automotive Ltd website and by accessing this, or any other Group 1 Automotive website you agree to be bound by them. If you do not accept these terms, please do not use the website.

We may change these terms at any time without notice by updating the terms shown on this website. It is your responsibility to review the website terms each time you enter the website to ensure you are aware of our latest terms and conditions. Your use of this website after a change has been made signifies your acceptance of the revised terms.

This website is for your personal use only and is not to be used for any commercial purpose.

These terms and conditions only apply to Group 1 Automotive websites. These are not the full trading terms and conditions of Group 1 Automotive; please contact your local Group 1 Automotive dealership or Group 1 Automotive Head Office for more information.

Group 1 Automotive. First Point St.Leonards Road, Allington, Maidstone, Kent, England ME16 0LS

Legal Entities

Group 1 Automotive Inc.	Beadl
Group 1 Automotive UK Ltd	Beadl
Chandlers Garage Holdings	Beadl
Barons Automotive Ltd	Beadl
Hodgson Automotive Ltd	Beadl
Think One Ltd	Walte
Spire Automotive Ltd	Beadl
Beadles Group Ltd	Robin

• Group 1 Automotive websites:

We try to keep our websites secure. However, you recognise when providing your information to us through our websites, or when you send us or ask us to send you any of your confidential information by e-mail, that the internet and email communications over the internet may not be secure. Group 1 Automotive cannot be responsible for any loss or unauthorised interception of information transmitted via the internet, which is beyond our control.

Group 1 Automotive websites may contain links to other websites outside of our group. Our Online Privacy Policy only applies to our websites. We are not responsible for the content, privacy or security of other websites.

When you visit our web site, our web server automatically records your IP address, the web site from which you visit us, the web pages you actually visit and the date and length of your visit. Personal data is only stored if volunteered by you, for example in the context of an enquiry, a survey, entering a promotional contest etc.

Information we may collect from you

- 1. Name (including title);
- 2. Postcode
- 3. Phone number;
- 4. Email address;
- 5. Vehicle information (including registration number, VIN and mileage)
- 6. The date and time you used our services;
- 7. The pages you visited on our website and how long you visited us for;
- 8. Your IP address;
- 9. Your GPS location (where you have permitted access to this);
- 10. The internet browser and devices you are using;
- 11. Cookie, Pixels or Beacon information (for more information please see our Cookie Policy);
- Uses made of the Information

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

- We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services, which may be of interest to you and we, or they may contact you about these by post or telephone.
- If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

• Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by contacting us.

Our site may from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

• Use of cookies on Group 1 Automotive internet sites

A 'cookie' is a piece of information that a website transfers to the cookie file of the browser on your computer's hard disk, so that the website can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the 'lifetime' of the cookie, and a value, usually a randomly generated unique number.

When you visit Group 1 Automotive internet sites, we may send you a cookie. We may use cookies in the following ways:

- To help us recognise you as a unique visitor (unique number) when you return to our website and to allow us to tailor content of our site to match your preferred interests; including any 'favourite vehicles' or 'vehicle comparisons', you may save.
- To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website. We cannot identify you personally in this way.

Two types of cookies may be used on Group 1 Automotive internet sites: session cookies, which are temporary cookies that remain in the cookie file of your

browser until you leave the site, and persistent cookies, which remain in the cookie file of your browser for longer, (how long will depend on the lifetime of the specific cookie).

Disabling/Enabling Cookies:

You can accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our websites if cookies are disabled.

You can find information on how to disable or enable cookies by visiting <u>www.allaboutcookies.org</u>.

Online Advertising We Use

We use Google AdWords and Social Media Remarketing to advertise triggers across the Internet. Remarketing will display relevant ads tailored to you based on what parts of the Group 1 Automotive internet site you have viewed by placing a cookie on your machine. This Cookie does not in any way identify you or give access to your computer. The cookie is used to say, "This person visited this page, so show them ads relating to that page." Remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

If you do not wish to participate in our Google AdWords Remarketing, you can opt out by visiting <u>Google's Ads Preferences Manager</u> You can also opt out of any third-party vendor's use of cookies by visiting <u>www.networkadvertising.org/choices/</u>

IP Addresses

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Live Chat Service

We use a third party provider, Gubagoo Inc.to supply and support our Live Chat service, which we use to handle customer enquiries in real time.

If you use the Live Chat service, we will collect your name, contact number or email address (optional) and the contents of your Live Chat session. This information will be retained for three months and will not be shared with any other organizations.

You can request a transcript of your Live Chat session if you provide your email address at the start of your session or when prompted at the end.

• Email enquiries and follow up period

We collect personal information through enquiry forms across all Group 1 Automotive websites; all personal information captured is deleted after 90 days. We may continue to contact you up to the 90-day anniversary unless we have reached contact resolution or we have been instructed to cease contact.

Call Recording

This includes most incoming and outgoing telephone calls that are handled by any Group 1 Automotive Centre, with the exception of calls where payment is taken (recording manually terminated).

Why are calls recorded? Recording customer conversations allows us to assess customer satisfaction, train and develop staff, review call quality, and have access to a verbal record of what is said in the event of a subsequent complaint. It also means employees feel more protected knowing that any threatening behavior can be evidenced and acted upon where necessary.

How will call recordings be used?

- **Quality monitoring** Written records only provide partial information. A call recording provides a more rounded view and allows us to better understand customer experience and assess the processes applied. This can help us identify any improvement areas.
- Training and Development Listening to a sample number of calls, allows managers to identify training needs. Sample scenarios are based on the recordings but any transcripts are anonymized.
- Gaining a better understanding of our customers Many calls are verbally resolved without the need to complete any records. Listening to sample calls will help us better understand our customer needs, and gain a more informed view of organizations we signpost to.
- **Complaints and disputes** Some calls are verbally resolved. Where information is entered onto an electronic system this becomes the established record. In the event of a complaint or dispute, a call recording (if available), may provide additional information to help us investigate any allegations.

- Employee safety and wellbeing A recording may become a vital piece of evidence in the event of any threats being made to the organization or an individual.
- Can I request a copy of my call recording? Call recordings are destroyed after twelve months. If the recording is available, you can request a copy of your conversation by making a request for access in writing to the below address.

Group 1 Automotive Head Office. Victoria Road, Portslade, Brighton, East Sussex, BN41 1YH

• Third Party Partners that we may share your information with

Audi	Black
BMW	Autop
MINI	Car C
SKODA	Autog
Vauxhall	Gubag
Mercedes-Benz	IHS N
Smart	Globa
Kia	Cox A
Toyota	Deale
Jaguar	Judge
Land Rover	Enqui
SEAT	CDK
Ford	
Volkswagen	
Volkswagen Financial Services	
Citroen	

Disclosures

We may disclose information about you to any of our employees, officers, agents, suppliers or subcontractors or service providers insofar as reasonably necessary for the purposes as set out in this Online Privacy Policy.

In addition, we may disclose information about you:

- to the extent that we are required to do so by law;
- in connection with any legal proceedings or prospective legal proceedings;

- in order to establish, exercise or defend our legal rights (including providing
- information to others for the purposes of fraud prevention and reducing credit risk);
- to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling;

With agents (including credit reference agencies, credit card clearing agencies, fraud prevention and detection agencies that we use to process the payment you place with us or who help us in the service we provide to you.

Data Protection

- Personal data shall be processed fairly and lawfully.
- Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998 and 2018 General Data Protection Regulations.
- Appropriate technical and organizational measures shall be taken against unauthorized and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Subject Access Request

You may instruct us to provide you with any personal information we hold about you. This is called a Subject Access Request and is made under the provisions of the Data Protection Act 1998 and 2018 General Data Protection Regulations. To obtain a copy of any personal information we hold contact the Data Controller at the address at the bottom of this policy.

As we take the issue of protecting your personal data seriously, we follow strict storage and disclosure procedures, which means we require proof of identity from you prior to disclosing such information. So that we may provide you with an optimum, service and comply with its obligations under UK Data Protection legislation, please let us know if any personal information, which you have provided to us, becomes inaccurate or out of date.

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

Post: Group 1 Automotive. First Point St.Leonards Road, Allington, Maidstone, Kent, England ME16 0LS

Email: dpo@group1auto.com

Phone: 01273 423 312

If you have any specific data protection concerns or a complaint, you can address it to our Data Protection Team at dpo@group1auto.com

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

Post:	Information Commissioner's Office
	Wycliffe House
	Water Lane
	Wilmslow
	Cheshire
	SK9 5AF
Call:	0303 123 1113

Email:

casework@ico.org.uk.