

# HELENSBURGH MOTOR SALES LIMITED PRIVACY NOTICE

Background:

Helensburgh Motor Sales Limited (representing Helensburgh Toyota and Helensburgh Subaru) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

## Information About Us

Helensburgh Motor Sales Limited

Company number 60106

Registered address: 5-7 John Street, Helensburgh, Argyll & Bute, G84 8BA

VAT number: 292 9346 22

Data Protection Number Z591723

We are directly regulated by the Financial Conduct Authority for consumer credit and non-investment insurance, Gary Mulvaney FCCA as the approved person for our regulated activity.

## What does this Notice cover?

This privacy information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

## What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data we use is set out in Part 5 below.

## What are my rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

The right to be informed about our collection and use of your personal data. This privacy notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.

The right to access the personal data we hold about you. Part 10 will tell you how to do this.

The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.

The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in part 11.

The right to restrict (i.e. prevent) the processing of your personal data.

The right to object to us using your personal data for a particular purpose or purposes.

The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with our data protection officer.

### **What Personal Data do you collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Date of birth
- Gender
- Address
- Email address
- Telephone numbers
- Business name
- Job title
- Profession
- Payment information
- Information about your preferences and interests
- Bank details for Direct Debits
- Underwriting information requested by finance company

Your personal data is obtained from the following third parties

- DVLA
- Toyota Great Britain (TGB) and affiliate companies as joint data collectors

## **How do you use my personal data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for or may be used for one of the following purposes:

Providing and managing your motoring needs

Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you

Personalising and tailoring our products and services for you

Communicating with you. This may include responding to emails or calls from you

Supplying you with information by email, post, text or phone that you have opted-in to (you may unsubscribe or opt-out at any time by emailing [im@helensburgh.toyota.co.uk](mailto:im@helensburgh.toyota.co.uk))

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with reminders, relevant offers, surveys and events on our products and services that will only be relevant to your motoring needs. You will not be sent any unlawful marketing or spam.

We share your personal information to Toyota GB and the IM Group (Subaru) for the purposes of gathering customer satisfaction feedback and updating customers on products and services including servicing and warranty registrations.

We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 20, and you will always have the opportunity to opt-out.

We use the following automated systems for carrying out certain kinds of decision-making. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact us to find out more using the details in Part 11.

The following automated decision-making method(s) may be used:

Finance companies for underwriting purposes

Motor insurance for underwriting purposes

Our dealer management system for aftersales reminders

## **How long will you keep my personal data?**

We will not keep your personal data for any longer than necessary in light of the reason (s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where the following factors will be used to determine how long it is kept):

For all new enquiries we will keep the data for as long as you wish to be kept informed of our services and will offer a simple opt-out facility at every touch point. When a vehicle or part is purchased or a vehicle is serviced we will keep your details as long as the information that we provide is both relevant and useful for your motoring needs. Once again a simple opt-out facility is provided at every touch point. Our electronic records are constantly updated and reflect our customer's wishes. We do have a policy that if a customer has not been seen or made contact in 5 years then we delete the data subject from our database. Our paper files are held on site in our archives for a minimum of 7 years for VAT purposes and after that securely shredded.

### **How and where do you store or transfer my personal data?**

We will only store or transfer your personal data in the UK. This means it will be fully protected under the GDPR.

### **How can I access my personal data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and a copy of it (where any such personal data is held). This is known as a 'subject access request'.

All subject access requests should be made in writing and sent to the email or postal address showing in Part 11. There is not normally any charge for the request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover administration costs.

We will respond to your subject access request within 1 month and in any case, not more than one month of receiving it. Normally, we aim to provide a complete response including a copy of your personal data held within that time. In some cases, if the request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

### **How do I contact you?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Gary Mulvaney)

[gary@helensburgh.toyota.co.uk](mailto:gary@helensburgh.toyota.co.uk)

01436 672779

Helensburgh Motor Sales Ltd

5-7 John Street

Helensburgh

Argyll & Bute

G84 8BA

Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on request.