

Please note that if you purchase a vehicle from a manufacturer franchised dealership that is not part of the Hendy Group network, or otherwise give your information to such a dealership, or to a manufacturer directly, you will have a separate relationship with that organisation in respect of the use of your data and you will need to contact the organisation concerned in relation to any request you may have in regards to that organisation's use of your data.

#### ABOUT THIS PRIVACY POLICY

This privacy policy applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.

We take the privacy of your personal information very seriously and will only use your personal information in accordance with the current data protection law in the UK and this privacy policy.

This privacy policy sets out:

- what personal data we process about you, the reason we process that personal data, our legal basis for processing that personal data, and how long we will process it for;
- who to contact in the event that you have any queries relating to your personal data;
- who we may share personal data with;
- the extent to which we transfer personal data outside the European Economic Area;
- the extent to which we use personal data to carry out any automated decision making with a legal or similarly significant effect on you as a data subject; and
- what rights you have in relation to your personal data, and how to exercise them.

#### WHO WE ARE, AND HOW TO CONTACT US.

Data controller, address and registered number:

We, Hendy Group Limited, are the data controller. Hendy Group includes the Hendy Group central departments and each of the Hendy car brands, including Ford Motor Company, Hendy Honda, Hendy Kia, Hendy Renault, Hendy Dacia, Hendy SEAT, Hendy Suzuki, Hendy Mazda, Hendy MG, Hendy MOKE, Hendy Nissan, Hendy Hyundai, Hendy Land Rover, Hendy Jaguar, Hendy Lotus, Hendy ?KODA, Hendy Toyota, Hendy Lexus, Hendy Iveco, Hendy Lister Petter, Hendy Lombardini, Hendy FPT, Hendy Honda Marine, Hendy Jobe, Hendy Honwave, Hendy Mugen, Hendy Spoon Sports, Hendy Project Mu and Hendy HKS.

We are a limited company registered in England under company number 00192872, with our registered office at Hendy Group School Lane, Chandlers Ford Industrial Estate, Eastleigh, Hampshire, SO53 4DG.

You can contact us via telephone on 02380 483100, by email on [datacontroller@hendy-group.com](mailto:datacontroller@hendy-group.com) or by mail at the address above.

#### THE PROCESSING

We may collect and process the personal data set out in the table below:

- for the purposes set out in the table below;
- in reliance on the lawful basis set out in the table below; and
- for the time set out in the table below.

Type of personal data	Purpose	Lawful basis for the processing	How long we keep it
Your name, contact details, your purchase history and records of communication you have had with us.	<p>For administrative purposes if you are a current or past customer, including to:</p> <ul style="list-style-type: none"> <li>• provide or manage a product or service you have asked for; and</li> <li>• help us to identify you when you contact us</li> </ul>	<p>Necessity to perform our contract with you.</p> <p>Failure to provide such data where we request it may mean we are unable to supply you with the requested product or service.</p>	<p>Seven years from the date on which we supply goods or services to you.</p> <p>If you do not purchase from us, 12 months from your last interaction with us.</p>
	<p>To carry out credit checks where you are purchasing products on credit terms.</p> <p>Please note that this only applies to trade accounts. Consumer credit is offered by our third party credit partner, Experian.</p>	Our legitimate interest in preventing default.	Seven years from the date on which we supply goods or services to you.
	To help us recover debts due to us from you.	Our legitimate interest of recovering money due to us	Seven years from the date on which we supply goods or services to you.
	To bring or defend legal claims.	Our legitimate interest of bringing or defending legal claims.	<p>Where you purchased a product regulated by the FCA, 10 years from the date you bought that product.</p> <p>Otherwise, seven years from the date you last dealt with us.</p>

Type of personal data	Purpose	Lawful basis for the processing	How long we keep it
	<p>To contact you about products and services offered by us, using one or more of:</p> <ul style="list-style-type: none"> <li>• - post,</li> <li>• - phone,</li> <li>• - e-mail,</li> <li>• - or SMS</li> </ul> <p>dependent on the permissions you have given us. Our current products and services include but are not limited to:</p> <ul style="list-style-type: none"> <li>• - vehicle sales</li> <li>• - motor related products and services, including (amongst other things) vehicle aftersales care, finance, leasing, ancillary insurances, vehicle accessories, vehicle emergency service, vehicle warranties and motor insurance; and</li> <li>• - personal finance products.</li> </ul>	Your consent.	Two years from the date on which you last gave your consent to marketing, although we may retain limited records to the extent required to maintain suppression lists.
<p>Your purchase history.</p> <p>History about email or website content you have previously engaged with.</p>	<p>Market research, which may include customer analysis and profiling.</p> <p>To help us improve our content, products and services, which may include profiling.</p>	Our legitimate interest of researching what content, products and services is/are popular, and to help us improve our content, products and services.	We only retain market research in an anonymised form.
	To identify other products or services you might be	Consent	Seven years from the date on, which you last

Type of personal data	Purpose	Lawful basis for the processing	How long we keep it
	interested in for the purpose of direct marketing, which may include profiling.		gave your consent to marketing, although we may retained,limited records to the extent required to maintain suppression lists.
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.	To help us secure and manage the performance of our websites.	Our legitimate interest of securing and managing the performance of our websites.	This data is only stored anonymised.
Your name, contact details, and personal documents enabling us to prove your identity, which may include your passport, driving licence, and / or national insurance number.	To help us detect and prevent fraud.	Our legitimate interest of preventing loss.	Seven years from the date on which we supply goods or services to you.
All relevant documents demonstrating the provenance of any values of cash you pay us in excess of £1,000  This is likely to include your name, contact details, bank details, and key information and documents in respect of your financial status.	To help us detect and prevent,money laundering.	Necessary for us to comply with a,legal obligation.  Failure to supply this information where we request it may result in us being unable to sell you the,requested product or service.	Seven years from the date on,which we supply goods or services to you.

#### WITHDRAWING YOUR CONSENT AND/OR OBJECTING TO OUR PROCESSING

Where we originally relied on consent to process your personal data, you will always have the right to withdraw that consent.

Similarly, where we originally relied on our legitimate interests to process your personal data, you always have a right to object to our processing of that personal data. However, we do not have to stop processing that personal following your objection where we are able to demonstrate either:

- we have compelling legitimate grounds to process that personal data which override your interests, rights and freedoms; or
- we require to data for the establishment, exercise or defence of legal claims.

Your right to object to legitimate interests processing is however absolute if it relates to processing for marketing purposes.

We highlight where these rights apply in the table of data processing activities above, and in this paragraph we provide detail of how to go about withdrawing your consent or objecting to our legitimate interest processing.

Withdrawing your consent to direct marketing, or objecting to our legitimate interest processing for direct marketing purposes.

Below we set out the easiest way to withdraw your consent to, or opt-out from, marketing communications.

However, you can always contact us by calling us on 01892 731480, emailing us at [marketing@hendy-group.com](mailto:marketing@hendy-group.com) or writing to us at: Marketing Dept, Hendy Group Ltd, Mount Ephraim, Tunbridge Wells, Kent, TN4 8AG.

- If we are not yet processing your personal data (i.e. because this is your first contact with us):  
You can opt out of receiving marketing communications from us by ticking the appropriate box on the form which you complete (whether on our website or via a paper form), or by contacting us at any time using the details set out above.
- If you previously opted-in to marketing or did not opt-out at the time you gave us your details (as the case may be): You can withdraw your consent or opt-out by clicking the unsubscribe link which we include on all of our electronic marketing communications, or by contacting us at any time using the details set out above.

Please be aware that you may opt-out of all marketing from Hendy Group, or from marketing from certain brands within the Hendy Group. If you only opt-out of marketing from specific Hendy Group brands, you may continue to receive marketing from other Hendy Group brands that you previously opted-in to marketing from.

Objecting to non-marketing legitimate interests processing

To object to any of our non-marketing processing based upon our legitimate interests (as highlighted in the processing activities table above), please contact us using the contact details at the top of this policy.

WHERE WE OBTAIN YOUR PERSONAL DATA FROM

We obtain personal data from the following sources:

- you, for instance where you contact us about, or purchase, one of our products or services;
- ourselves, for instance where we generate data about you (for instance a credit decision based on other personal data, or a data relating to the products or services we think you might be interested in);
- from other dealers within the Hendy Group of companies for administrative purposes;
- occasionally from other third parties who may lawfully pass to us information about you, but never for marketing purposes; and
- If you apply for a position with us or another of the Hendy Group of companies.

PERSONS WITH WHOM WE MAY SHARE YOUR DATA:

In general, access to your personal data will be restricted to those who have a need to access it in order to carry out their duties (for example, our customer service teams and finance teams).

However, we will also share your personal data with the following external third parties, and our vehicle manufacturer partners, in some circumstances:

- our other trading divisions, subsidiaries or parent companies;
- regulators and government authorities such as HMRC or the police, if we are required to do so by law or if the regulator or authority requests it and we regard that request as reasonable;
- fraud prevention agencies or other third parties that assist us in preventing fraud or loss;
- our insurers, legal advisers or other third parties who need access to it in the context of managing, investigating or defending actual or potential claims or complaints;
- a potential purchaser of one of our businesses;
- a third party to whom we transfer our customer agreement with you;
- third party organisations where you have agreed that we may do so, typically for purchasing a product offered by that third party (e.g. a personal finance product); or
- organisations that process your data on our behalf which are not allowed to use your data for any other purpose (which include, for instance, marketing agencies or data management firms).

TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA

In certain limited circumstances, we may export personal data outside of the European Economic Area for processing, and we may use third party service providers who do the same.

We only do that if there is a good reason to do it and where adequate safeguards (such as the appropriate contractual arrangements with suppliers, or adequacy decisions, depending on the destination country) are in place.

YOUR RIGHTS (WITH EFFECT FROM 25 MAY 2018)

The law gives you certain rights in respect of the personal data that we hold, which you should be aware of:

- You have the right to obtain your personal data from us except in limited circumstances. Where we provide it, the first copy will be free of charge, but we reserve the right to charge a small fee for additional requests.
- You have the right to require us to rectify any inaccurate personal data we hold concerning you.
- Taking into account the purposes of the processing, you may also have the right to have incomplete personal data completed, by means of providing a supplementary statement or otherwise.
- You have the right to require us to erase your personal data on certain limited grounds (including where they are no longer necessary for the purpose for which they were collected or where you withdraw your consent and there is no other legal ground for the processing).
- Where we process personal data either on the basis of consent or contractual necessity, you provided the personal data to us, and we process that personal data by automated means, you have the right to require us to give you your data in a commonly used electronic format.
- You have the right to object to our processing of personal data which we process on the grounds of our legitimate interests, although we do not always have to honour your objection. For more information see the section above titled "Withdrawing your consent and/or objecting to our processing".
- You have the right to require us to restrict the processing of your personal data on certain grounds, including where:
  - you contest the accuracy of the personal data and want us to restrict processing of your personal data while we verify its accuracy;
  - the processing is unlawful, but you request a restriction of the processing rather than erasure;
  - we (as controller) no longer need the data for the purposes of the processing, but you have told us you require us to retain that personal data for you to establish, exercise or defend legal claims; or
  - you have objected to us processing your personal data on grounds of legitimate interests and want us to restrict processing of your personal data while we consider your objection.

If you would like to exercise any of these rights, please contact us using the details set out at the top of this policy.

#### IF WE CAN'T REMEDY AN ISSUE YOU HAVE

Should you have any complaints or issue with our treatment of your personal data, you may lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk>).

HENDY GROUP LTD INTERNET SITES:

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 e mail communications over the internet may not be secure. We cannot be responsible for any loss or unauthorised interception of information transmitted via the internet, which is beyond our control.

Our internet sites may contain links to other websites outside of our group. Our 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 sites, 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.

#### USE OF COOKIES ON HENDY GROUP 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 our 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 (not just a 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; and
- 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 where we use cookies in this way.

Two types of cookies may be used on our internet sites:

- session cookies, which are temporary cookies that remain in the cookie file of your browser, usually until you close your browser; 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 [www.allaboutcookies.org](http://www.allaboutcookies.org).