

Customer Privacy Policy

Myers & Bowman

Privacy Policy Customers' Version

1 Introduction

1.1 The Myers & Bowman - Toyota Ltd Company Limited is a company registered in England with company number 336671, VAT registration number GB2565 465 38 and whose registered office is at Lillyhall Ind Estate, Workington, Cumbria CA14 4PE. The term 'you' refers to the user or viewer of this Privacy Policy.

1.2 This Privacy Policy explains what information we collect, how we may use it, and the steps we take to ensure that it is kept secure. It also explains the right an individual has in respect of their personal information and how to contact us.

1.3 This Privacy Policy is to be read in conjunction with our "Terms and Conditions of Use". All definitions used in the "Terms and Conditions of Use" shall apply to this Privacy Policy unless otherwise stated.

1.4 This Privacy Policy is part of a formally documented information governance system and is subject to periodic review.

1.5 We can be contacted by using the contact details at section 26.

2 About Us

2.1 Myers & Bowman - Toyota Ltd, arrange finance, sell and buy new & used vehicles operate a range products and marketing, and are responsible for operating a range of core services that enable us and other parties, i.e. Toyota GB, Wigwam, Chameleon, Emac, Northridge, DVLA, ITC, Motability, GAP/Abraxas & Toyota Insurance with Myers & Bowman - Toyota Ltd group to run efficiently.

2.2 We recognise our responsibilities as a provider of services which involve the processing of personal information and we take great care to protect the personal information that we process. We operate and maintain a comprehensive information governance management system comprising several policies and procedures, a record keeping system, document management system, internal audits and periodic external audits.

2.3 We are registered as a data controller in the United Kingdom and our registration number is Z5450982. Refer to the Information Commissioner's Office (ICO) website www.ico.org.uk 'Register of Data Controllers' for further information.

3 Management Responsibility

3.1 The Board of Directors has overall responsibility for our privacy and data protection compliance. The Head of ICT Mr William Hewett is responsible for the application of our privacy and data protection arrangements. The Data Controller Mrs Catherine Johnson & the Marketing Manager Mr Brian Richardson are responsible for monitoring the privacy and data protection record keeping system; ensuring our day-to-day work practices conform to the high standards we expect;

and for reporting through the Board of Directors the standards maintained regarding our information governance.

4 Information we collect and what we do with it

4.1 We collect a wide variety of personal information from a wide range of sources in order to run our business activities. We perform periodic reviews of our data collection activities and processes in order to test that they conform to our expectations. We aim to only collect information that is necessary for us to perform our business operations efficiently and effectively. We periodically review our data collection arrangements.

4.2 We aim to provide any person whose information we are collecting with sufficient information so that they know who is collecting their information and what we intend to do with it. If this information is not obvious from the data capture mechanism, we may choose to provide this information in the form of a Privacy Statement or Fair Processing Notice on or linked to a data capture form.

4.3 Below are listed some of the data sources we use, the nature of the data we collect and the reasons why we collect and process it.

4.4 Customer Data. In order to provide the services that we are engaged to provide by our customers (such as selling of vehicles, servicing & related products) we collect, store and use personal information disclosed to us via our website, telephone conversations, showroom visits and Social Media. The data that we collect for these purposes includes names and addresses, dates of birth, contact information such as phone numbers and email addresses and financial information such as credit/debit card information & Bank details. Where appropriate we also collect details of any disability or health needs you may have to help ensure your safety. We use this information primarily to process vehicle sales, products and events. We also use this information to undertake marketing activities such as building a profile of our customers. We do share most of this data with Toyota GB. We also share some of this data with third parties including TFS, European Vehicle Contracts, Emac, Northridge, DVLA, ITC, Motability, Gap/Abraxas & Toyota Insurance, to allow them to carry out marketing activities with the consent of Myers & Bowman – Toyota Ltd. We will not share your personal information or use it to contact you if you ask us not to. However, we sometimes share this information with other third parties for the purposes of crime prevention and the prosecution of offenders. Information of this nature is recorded and stored in specialist database systems.

4.5 Financial Information. We use your financial information to process payments for products and services that are purchased from us and for fraud detection and prevention. We maintain an appropriate accreditation under the PCIDSS (Payment Card Industry Data Security Standard) in order to apply high standards of information governance for financial information that we process.

4.6 Employee Data. As an employer we collect and process information about applicants for jobs and details about the people that we employ.

Other Data Collection

4.7 We use 'cookies' on our web sites that allow us to recognise returning system users and customise their experience. Cookies can collect and use data. Please see section 14 below for full details of the type of cookies we use, why and how we obtain your consent to use them.

4.8 We operate CCTV systems outside our showroom which collects data to help us to maintain a safe environment. We also use the CCTV information for the purposes of security and crime prevention.

5 Fair and Lawful Processing

5.1 Our policy is to process personal information in a fair, transparent and lawful manner.

5.2 In general, we aim to only process personal information with the consent of the data subject. In most cases people will complete a data collection form and submit it to us. We aim to provide sufficient information regarding how we will use the data at the point data is collected to allow the person who is completing the form to make an informed choice whether or not to give us their personal information.

5.3 In exceptional circumstances we may process personal information without the consent of the data subject and will rely on the exemptions set out in the General Data Protection Act 2018 that allow for this or on our legitimate interests to process personal information as a business. In the latter case we would always seek to consider our interests with the rights of individuals in order to make a balanced judgement whether to process personal information without the consent of a data subject.

6 Personal Information and the Internet

6.1 Myers & Bowman – Toyota Ltd operates a website and social media sites some of which facilitate customers/ and or people who are interested to interact with each other socially. This may allow them to exchange views and opinions about Myers & Bowman – Toyota Ltd and each other. We require all users of our social media facilities to agree to a code of use, set out by these sites, which sets out appropriate standards of behaviour. We monitor the information that is shared on Social Media and take appropriate action against users who are not conforming to the code of use of these sites.

6.2 Information including personal information that is posted on Social Media is publically disclosed. As such we strongly advise website users to think carefully about information that they post.

6.3 We will endeavour to remove any information from our Social Media Sites requested by the users if 1) it relates to them and was not posted by them; 2) it was posted by them; or 3) it is deemed to be inappropriate by us.

7 Data Accuracy and Updates

8.1 It is our policy to expect those who provide us with their personal information to keep us informed of any changes to the information that we may hold about them. If data subjects bring inaccuracies to our attention we will apply corrections to the data that we hold about them.

8 Data Enrichment

9.1 On occasions we attempt to enrich the data that we have collected through our own activities with information from other sources to help us to more accurately profile our customers and prospects.

9 Electronic Marketing

10.1 We maintain a computer-based preference centre system to manage the contact preferences of our customers in order to satisfy our obligations under the Privacy and Electronic Communications Regulations 2018. We operate several customer touch points and the preference centre is designed to maintain a set of master preferences for email, telephone, and mail marketing.

10.2 Where you have given your consent, we will use the information you provide to send you information and offers relating to, and/or from, Myers & Bowman – Toyota Ltd, Toyota GB and partners and group companies. A full list of the partners is available on request.

10.3 Each data collection activity will normally contain a mechanism for customers to opt out of Myers & Bowman – Toyota Ltd contacting them with marketing information. Customers may change their preferences by contacting us at via the contact details at section 26 below.

10 Data Retention

10.1 We maintain a Data Retention Policy in which our retention periods are defined – in general we retain personal information for as long as is necessary to fulfil the purposes for which it was collected and/or in order to comply with our legal obligations. Once personal information passes its retention deadline it is deleted and destroyed in accordance with our Data Destruction Policy.

11 Information Rights

11.1 We are aware of the rights of individuals as set out in the Act and in general of the right to fair processing of their information and we aim to uphold those rights in the processing that we undertake and in our approach to information governance.

11.2 You have the right to:

- see a copy of the information that we hold about you;
- ask that the information we hold about you is corrected;
- ask that we stop sending you marketing information; and

- request that we remove your personal information from our database.

11.3 For further information about our information governance regime or to exercise any of your information rights please write to us as set out at the address below.

12 Access to Data

12.1 We control access to data on a need-to-know basis to ensure that our employees and agents only have access to the information that they need to perform their job/function. Employees are required to sign a Privacy Policy before they are allowed to use the IT assets and process the any date data.

13 Cookies

13.1 In common with many other website operators, we may use standard technology called 'cookies' on the websites and Social Media sites. Cookies are small pieces of information that are stored by the browser on a computer's hard drive and they are used to record how people use and navigate websites.

13.2 Cookies do not attach to your system or damage your files. Our cookies are used to enable us to develop our website to reflect your interests and by noting which pages and advertisements you have visited, how frequently particular pages are visited and determining the most popular areas of our website. We may use cookies to enrich your experience of using Myers & Bowman – Toyota Ltd website is owned & operated by Toyota GB, please refer to their policy & procedures.

13.3 They use the following categories of cookies on the website:

- Category 1: Strictly Necessary Cookies

These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for such as remembering your vehicle choices or shopping basket items cannot be provided.

- Category 2: Performance Cookies

These cookies collect anonymous information on how people use the website. For example, we use Google Analytics cookies to help us understand how customers arrive at the website, browse or use the website and highlight areas where we can improve areas such as navigation, shopping experience and marketing campaigns.

The data stored by these cookies never shows personal details from which your individual identity can be established.

Category 3: Functionality Cookies

These cookies remember choices you make such as the country you visit the website from, language and search parameters such as size, colour or product line. These can then be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

Category 4: Targeting or Advertising Cookies
Category 5: Social Media Cookies And Tracking Pixel

These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third party advertising networks. They remember the websites you visit and that information is shared with other parties such as advertisers.

These cookies allow you to share what you've been doing on the website on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the privacy policy for the relevant social media platform(s) for how their cookies work.

13.4 Most browsers automatically accept cookies, but you can usually change your browser to prevent cookies being stored. Please note, if you do turn cookies off this will limit the service that we are able to provide to you and may affect your visitor experience.

13.5 For further information on cookies and how to switch them off see:
www.allaboutcookies.org.

14 Sub-Processors

15.1 Where we use third parties to process personal information we do so only within the framework of a written agreement setting out the responsibilities and obligations of each party. We undertake appropriate due diligence prior to appointing any sub processors which may involve us inspecting their data processing site and arrangements. We require all of our sub processors to maintain a high level of governance in respect of any data that we are responsible for.

15 Information Disclosures

15.1 We are sometimes asked to disclose personal information as a one-off exercise and we maintain a policy on information disclosures. In the case of a data subject requesting information about themselves we may treat this as a subject access request and we will follow our subject access request procedure.

15.2 Where we are requested to disclose personal information by third parties (e.g. a public authority) we will follow our Third Party Disclosures Procedures.

15.3 It is our policy to log all information disclosure requests that we receive.

16 Information Sharing

16.1 We routinely share some of the information that we collect with third parties and maintain an Information Sharing Policy. A privacy risk assessment process or breach potential mapping is maintained to enable us to objectively consider information sharing requests. Information sharing is only carried out under the scope of an information sharing agreement binding on all relevant parties.

16.2 In general, most of the general personal information is shared amongst the employees of Myers & Bowman - Toyota Ltd. Sensitive personal information is generally not shared unless there is a compelling and lawful reason to share such information.

16.3 Some information that we collect is shared with external third parties such as commercial partners for them to present relevant offers to you.

16.4 Some third parties share data that they collect with us. Unless we are bound by the terms of a data sharing agreement with any such third party this Privacy Policy and our information governance arrangements to data shall apply.

17 Transfers of Information outside Europe

17.1 As a matter of policy we aim to not to transfer any personal information that we are processing outside of the European Union unless (i) it is to a territory approved by the European Commission, (ii) it is to an organisation in the United States of America which is Safe Harbor accredited, or (iii) we have satisfied ourselves that the person with whom we are sharing information is able to uphold privacy and data protection principles to at least the same standard as the United Kingdom. We have a process for assessing the risk posed to the privacy of our data subjects of any overseas processing. The physical location of our data assets is recorded in our Data Policy

18 Information Security Arrangements

18.1 We maintain an Information Security Policy which sets out the measures that we use to protect personal data that we are processing and the privacy of our data subjects. The InfoSec Policy sets out technical measures that are deployed to identify, classify and protect data and assets, access controls used to restrict access to information, testing arrangements, incident logging and management reporting.

19 Data Processing Equipment and Media

19.1 We maintain an asset log of all of our IT equipment including network devices, servers, and PCs, and we also maintain an asset log of our data assets (e.g. key individual databases). We only use equipment of an appropriate specification and quality. We maintain appropriate technical measures to protect data that we process both in respect of storage and transit as set out in our Information Security Policy.

20 Destroying Data, Media, and Equipment

20.1 Once data is no longer required we ensure that it is securely and permanently deleted. We maintain a Data Destruction Policy which specifies the method(s) that we use to destroy data.

20.2 When storage media becomes retired it is securely destroyed. Our Data Destruction Policy sets out the method(s) that we may use to clean and destroy storage media.

20.3 When computers and other data processing equipment is no longer required we ensure that it is appropriately disposed of in accordance with our IT and Data Asset Management Policy and Procedures.

21 Incidents

21.1 We maintain a policy of logging and investigating all information security incidents and near misses. Our Information Incident Policy and Procedure sets out the scope of what we log, how we investigate issues, and the circumstances under which we might report or notify any third parties about such issues. Our aim is to learn from these issues in order to enable us to continually improve our information handling.

22 Training and Awareness

22.1 We undertake regular staff training about data protection and privacy. All new employees receive data protection training as part of their induction and all other staff are required to attend periodic refresher training. We maintain records of all training that we undertake. We also undertake regular data protection and privacy awareness activities to keep the matter front of mind for all of our staff.

23 Information Risk Management

23.1 We have a policy of applying a risk assessment process to any major decisions we are considering that affect the data we are processing (e.g. changing supplier or major platform functionality). We maintain a log of privacy impact assessments.

24 Audit and Management Reporting

24.1 Our Information Audit and Management Reporting Policy sets out the scope of the internal and external audits that we undertake to monitor compliance with the Act, and conformance with our own work practices to our policies. We undertake periodic internal audits and an annual external audit using a specialist data protection consulting firm. All audit reports are logged and maintained in a register – audit actions are logged, actioned, and verified as complete. The Board of Directors are responsible for the application of our privacy and data protection arrangements.

25 Changes to the Privacy Policy

25.1 We aim to meet high standards and our policies and procedures are therefore constantly under review. From time-to-time we may change our security and privacy policies. We maintain version control over all of our information policies and procedures to enable anyone who is interested in privacy policy and information governance arrangements to note changes.

25.2 This Privacy Policy is periodically reviewed and was last updated on 28th April 2018

26 How to Contact Us

Please contact us using the details below if you wish to discuss any aspect of this Privacy Policy:

The Data Controller

Myers & Bowman - Toyota Ltd

Lillyhall Ind Estate

Lillyhall

Workington

Cumbria

CA14 4PE

Tel: 01946 832282

Email: sa@myers-and-bowman.toyota.co.uk