

Ron Brooks Group **Privacy Policy**

Summary

As part of your dealings with the Ron Brooks Group, we will collect and otherwise process personal information about you in order to supply vehicles, goods and services to you and to accurately maintain our business relationship with you. This may involve sharing your personal information with third parties. This Privacy Policy describes in detail how we will use your personal information and how you can exercise your rights with respect to your personal information.

If we decide to change this Privacy Policy, we will post the updated Privacy Policy on our websites so that you are always aware of what personal information we collect, how we use it and under what circumstances we disclose it. The updated Privacy Policy will take effect as soon as it is posted on our website.

Introduction

In this Privacy Policy, references to **we, us or our** (or words of similar import) means Ron Brooks Limited.

In this Privacy Policy, references to **you or your** mean the person whose personal information (as defined below) we collect, use and process. This includes anyone who visits our websites, contacts us in connection with the purchase of a Vehicle and/or any goods or services we provide or otherwise interacts with us (for example, via a dealership).

In this Privacy Policy, references to a **website** means any website owned and operated by or on behalf of Ron Brooks.

We are committed to protecting your privacy. We will use your personal information in accordance with the Data Protection Act 1998 up to and including 24 May 2018 and the EU General Data Protection Regulation 2016/679 thereafter (**GDPR**) (together the **Data Protection Legislation**), and all other applicable laws and regulations that relate to data protection and privacy.

Who is responsible for your personal information?

For the purposes of the Data Protection Legislation, Ron Brooks Limited is the data controller in respect of your personal information that we collect, and process as further described in this Privacy Policy.

We may share your personal information with other organisations that may receive and process your personal information as a data controller in their own right. Please see below for further information. Ron Brooks Limited is registered at the Information Commissioners Office under registration number – Z8490826

What information do we collect?

We may collect and process information about you, including your name, date of birth, address, contact details (including email address and mobile phone number), vehicle details, purchase history and data collected as part of any finance application or payment (including previous addresses, employment details and bank account details). This information is referred to in this Privacy Policy as **personal information**.

In particular, we may collect and process the following personal information about you:

1. Information that you provide by filling in forms, including those on our websites.
2. A copy of your driving licence when you test drive a vehicle or are provided with a courtesy car.
3. When you enquire about or purchase a vehicle or services we collect personal information to respond to your enquiry and to process and complete your purchase.
4. Details about the transactions you carry out with us including vehicle support services and vehicle purchases and purchases of other goods.
5. CCTV footage in which you feature when you visit our premises.
6. Information contained in and records of communications between us, including e-mails, letters and text messages.
7. Details of your visits to our websites, including, but not limited to, traffic data, location data (including the country and telephone area code where your computer is located), IP address and the resources that you access (including the pages of our website that you view).
8. We will collect information concerning your marketing preferences.
9. We also collect information to enable third parties to carry out credit reference checks on you (if you are purchasing a vehicle on finance) and we will receive and process information about the outcome of those checks in order to complete your purchase.
10. We will collect information relevant to the insurance products that we sell that are provided by third parties.

We may also collect non-identifying information about your preferences in connection with our websites, for the purposes of enhancing and personalising your experience on the websites. We may provide our manufacturer partners and our advertisers with aggregate information about website users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

How do we use your personal information?

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

1. To respond to queries from you regarding the possible purchase of goods or services;

2. To carry out our obligations arising from any contracts entered into between you and us including purchase of vehicles and provision of services, and to respond to queries from you regarding those contracts;
3. To manage and administer the relationships between you and us;
4. To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us; and
5. To obtain feedback from you regarding us; and
6. To provide you with reminders regarding your vehicle including, for example, when your vehicle is due to have a service or MOT undertaken.

In accordance with your preferences, we may also use your personal information to provide you with information about vehicles, services, promotions and offers that may be of interest to you. The section below entitled “What choices do I have?” explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we will use your personal information to provide you with important services communications, including communications in relation to any purchases you make or vehicle support services as we have a legitimate interest and or contractual obligation to you to do this (i.e. in relation to a recall or to remind you of your service dates to maintain your warranty cover).

Your personal information may also be used by us, our employees, contractors or agents, and disclosed to third parties, in order to comply with any legal obligation (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us, or to protect our rights, property or safety or those of our customers, employees or other third parties).

With whom do we share your personal information?

In connection with the above uses of your personal information, we may share your personal information with third parties as described below.

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

1. We may pass your personal information to third party organisations that provide services to us (including assisting us with carrying out marketing activities).
2. We may pass personal information to external agencies and organisations (including the police and other law enforcement agencies) for the purpose of preventing and detecting fraud (including fraudulent transactions) and criminal activity. We may also disclose personal information to the police and other law enforcement agencies in connection with the prevention and detection of crime.
3. We may pass your personal information to a third-party finance company for the purposes of them providing you with finance. Those organisations may carry out credit checks and may disclose your data to credit reference agencies for that purpose.

4. We will pass your personal information to third party providers of insurance products that we offer if you take up the option of purchasing one of those products.
5. In the event that we sell or buy any business or assets (including car dealerships), we may disclose personal information held by us about our customers to the prospective seller or buyer of such business or assets. If Ron Brooks Ltd or all of its assets are acquired by a third party (or subject to a reorganisation within our corporate group), personal information held by us about our customers will be one of the transferred assets.
6. We may pass your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation (including in connection with a court order), or in order to enforce or apply the terms of any agreements we have with or otherwise concerning you (including agreements between you and us, or to protect our rights, property or safety or those of our customers, employees or other third parties;
7. We may pass your personal information to the relevant franchise manufacturer partner relating to your vehicle. They may contact you directly regarding your vehicle and to obtain feedback and/or to provide offers.
8. We may share non-personal aggregate statistics (group) data about visitors to our websites, sales and traffic patterns with other parties.

How long do we retain your data for?

At Ron Brooks Ltd we only retain your data for as long as required by law or where we have an appropriate business justification.

For further information on how long Personal Data is likely to be kept before being removed from our systems and databases, please contact us using the details below.

Protecting your personal information

Our security procedures mean that we may occasionally request proof of identity before we are able to disclose sensitive information to you.

The transmission of information via the internet is not completely secure; this risk is not specific to our Websites and is common across the internet. We cannot guarantee the security of your data (including your personal information) transmitted to our website; any transmission is at your own risk.

What rights do I have?

If you think the personal information we hold about you is inaccurate or incorrect, you can request that we correct this information (including your marketing preferences) by writing to us using the details below.

You can choose to stop receiving marketing emails or SMS messages from us by following the unsubscribe link and instructions on the respective marketing emails or SMS messages we send you.

You can also choose to change your marketing preferences by writing to us using the details below.

The Data Protection Legislation gives you the right to access your personal information. To request access to your personal information, please contact us using the details below.

You also have a right to lodge a complaint to the Information Commissioners Office (ICO).

You have the right to request that we delete your personal data in certain circumstances. If you would like more information about this, please contact us using the details below.

Third Party sites

Our website(s) contain links to other websites. This privacy policy applies only to our website(s), so visitors should always be aware when they are moving to another site and read the privacy statement of any site which collects personal information. We cannot be responsible for the privacy policies and practices of other sites even if you access those using links from our websites.

We do not pass on any personal information about our visitors to any other site (unless we have obtained your consent to do so). In addition, if you linked to a website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site and contact the owner or operator if you have any concerns or questions.

Transferring your information outside of Europe

As part of the services offered to you through the website, the information which you provide to us may be transferred to countries outside the European Economic Area (**EEA**). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA. If we transfer your information outside of the EEA in this way, we will take steps to ensure that it is to a country with data protection laws which are at least as stringent as those in England.

If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

Cookies

Our website uses cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our Website.

The cookies we use are “analytical” cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way our website works, for example by ensuring that users are finding what they are looking for easily.

How to contact us

If you have any questions, comments or requests regarding this Privacy Policy, please feel free to contact us by writing to us at: The Company Secretary, Ron Brooks Ltd, The Gateway, Derby Road, Ilkeston, Derbyshire, DE7 5FH, or by emailing gdpr@ronbrooks.co.uk