# RRG GROUP - GDPR Privacy Notice

RRG GROUP Limited and its subsidiaries ('RRG') takes its obligations concerning data protection seriously. We are providing this notice so you have information about how we collect and process your personal data. We ask you to please read this Privacy Notice as it has important information you need to know.

## What does our company do?

RRG are an Automotive specialist, selling new and used vehicles and supplying cars to both consumers and businesses. RRG are also an approved and accredited vehicle servicing, MOT and maintenance specialist. RRG are also a body repairer that repairs accident damaged vehicles for individuals, motor insurance companies, managed repair networks, fleets and local businesses. We work with contracted specialists and vehicle dealerships that supply us with parts, paint, materials, and services to enable us to supply and repair your vehicle.

## What information do we collect and process?

In order for us to supply or repair your vehicle it is legitimate and necessary to receive from your insurer, fleet manager, company, or from yourself necessary personal data. "Personal Data" is information about you which, either on its own or when connected with other data, allows us to identify you as an individual customer to provide you with our services. The personal data we hold may include the following:

- Your full name and contact information (address, town, postcode, email and phone number)
- Your credit card details and/or bank account details (if paying by cheque or bank transfer)
- Your purchase details (including time, date and cost, and VAT status and insurance excess)
- Your insurance company (if our work is part of an insurance claim)
- Your vehicle information (make, model, registration number)
- Your proof of identity (valid driving licence and/or passport)
- Your image on security CCTV around our site
- Your work address and contact information (where appropriate)
- Your calls and correspondence with us
- Your feedback

Personal data will be collected from you or passed to us by your insurance company/fleet manager/vehicle manufacturer or vehicle recovery agent. However,

some personal data may, where lawful to do so, or with your consent, be collected by us from third parties.

Please note that you are under no obligation to provide us with your personal data, but not providing certain data could prevent us from serving you effectively.

## Why do we need your personal data?

RRG processes personal data about you for a number of purposes, including:

- To administrate the process of buying or selling your vehicle
- To administrate and carry out service, repair, manufacturer recalls or MOT work on your vehicle
- To make contact with you with offers and services relating to the replacement of your vehicle
- To organise specialist repair functions such as system recalibration with contracted third parties
- To follow up with you shortly after the repair to your vehicle to check everything is okay
- For internal record keeping (to be able to respond to customer enquiry and invoicing)
- To make an appointment with you to assess the accident damage on your vehicle
- To carry out customer satisfaction surveys directly or via our manufacturers
- For number plate recognition as part of our customer service and site security
- To process payments by credit/debit card or bank account details
- To remind or update you, regarding the maintenance of your vehicle (such as service and MOT) and advise of progress or completion dates
- To provide our services to you as requested or agreed
- To help us improve the services we offer

This list is not exhaustive and may be updated from time to time. We do not 'trade' in your personal data and will not sell or rent your details.

## Our lawful basis for processing your personal information

Under the General Data Protection Regulation (GDPR), the lawful bases that we rely on for processing your personal information are:

Your consent – where you have provided your consent we may contact you regarding products, offers and events, via email, SMS, phone or post. Where consent is given, we may also share your personal information and vehicle information with our manufacturers. You can remove your consent at any time by clicking here <a href="data">data</a>
<a href="personal">personal</a> information and vehicle information with our manufacturers. You can remove your consent at any time by clicking here <a href="mailto:data">data</a>
<a href="personal">personal</a> information and vehicle information with our manufacturers. You can remove your consent at any time by clicking here <a href="mailto:data">data</a>

We have a contractual obligation – we may process your personal data where required to perform a contract or in order to take steps at your request prior to entering a contract.

We have a legitimate interest – we may use your personal data where required for us to carry out activities where it is in our legitimate interests to do so, including the following circumstances.

- To provide service, MOT and maintenance reminders and to inform you of any manufacturer recalls.
- To enable us to improve our products and services.
- To contact you regarding any changes to your local centre.
  - o To record telephone calls for training and monitoring purposes.
  - o To provide customers with free Wi-Fi at our centres.
  - To record CCTV in order to keep the property, employees and visitors safe.
  - Messages and enquiries received through social media platforms such as Facebook, LinkedIn, WhatsApp will be treated a legitimate interest, in the same way as telephone calls and internet form enquiries. Our Cookie Re-Marketing policy via social media platforms such as Google and Facebook, to advertise offers that are targeted to your interests can be found here.
  - We also consider telephone enquiries, live chat enquiries and internet form enquiries as expressing "Legitimate interest": If you have completed a form or made a live chat or telephone enquiry we will respond to your enquiry by your preferred method of contact and may continue to use the personal information you provide to follow up your enquiry for as long as we have an appropriate business justification.

We may send you marketing communications for similar products and services. You are able to opt-out of further processing at any time by visiting <u>data preferences</u>, Alternatively, you can contact the dealership directly or contact our Data Protection Officer to opt out.

All of our existing Customers continue to be considered as Legitimate Interest until consent can be obtained.

From 01/04/22 we will be transitioning to processing data on a consent basis.

You can adjust your preferences by visiting our data centre.

## Who will your personal data be shared with?

RRG are approved by a number of vehicle manufacturers, insurance companies and accident management companies. We may share your basic personal data, such as name and address, contact details, claim number and vehicle details with the relevant company you are connected with to provide the service you have requested.

Your personal information may also be made available with third parties providing relevant services under contract to RRG, such as specialists in system recalibration, auditors, compliance managers, insurance companies, IT hosting, and maintenance providers. These companies may use information about you to perform their

functions on our behalf in accordance with the services we have requested and contract terms imposed.

We may also disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law.

In the event that we sell our business, we may share your details with the buyer to enable them to fulfil the service we have agreed with you.

Your personal information will not be transferred to, stored or otherwise processed outside the UK.

#### Do we get involved in direct marketing?

RRG does use direct marketing activities in relation to products and services which may be of interest to you based on your purchase history. Our marketing activities in the form of customer letters, newsletters, emails, surveys and SMS messages are totally optional and we can adjust the way we communicate with you.

We can manage your communication preferences for you - simply email: <a href="mailto:dataupdate@rrq-group.com">dataupdate@rrq-group.com</a>

## What rights do you have to amend personal data?

You have the right to review the personal data held by us and have inaccurate information about you corrected. To understand more about our data processing activities or to request access to your personal information please contact our customer support team or email <a href="mailto:viewdata@rrg-group.com">viewdata@rrg-group.com</a>

## How long do we keep your personal data?

Personal information will be retained for an appropriate period of time. We will keep your data for the duration of you being classed as a current customer. We define a current customer as someone who has had vehicle maintenance carried out within the last 3 years or purchased a vehicle within the last 7 years.

RRG may keep your details on record for as long as it is necessary to meet record keeping requirements. We hold booking, invoice and email details for seven years. They are then deleted in accordance with data protection and other applicable legislation. Should you wish to make a warranty claim after this period, you will need to provide a copy of our invoice or our completed guarantee.

Inbound and outbound telephone call recordings will be stored for 12 months and then deleted.

## **Changes to this Privacy Notice**

RRG may change this Privacy Notice from time to time in order to reflect changes in the law.

## Your right to complain to the data protection regulator

We'd like the chance to resolve any complaints you have, however you also have the right to complain to the UK data protection regulator (the "ICO") about how we have used your personal data. Their website is <a href="https://ico.org.uk/">https://ico.org.uk/</a>
Their website also contains useful information about your privacy rights <a href="https://ico.org.uk/for-organisations/resources-and-support/your-data-matters">https://ico.org.uk/for-organisations/resources-and-support/your-data-matters</a>

We may collect technical data about the type of internet browser and computer operating system you use. This information does not identify you as an individual and is only for tracking website usage.

We may also place a "cookie" on your hard drive that will help us identify you when you return to the site and allow us to tailor content to your personal preferences. If you do not wish to use "cookies" you may disable this option in your internet browser settings.

#### See our Cookies policy

Version History

- 01 GDPR Privacy Notice 14/05/2018
- 02 GDPR Privacy Notice 23/05/2018 ICO website information added.
- 03 GDPR Privacy Notice 10/02/2022 Legitimate Interest / Consent and Contract definition update.