

PRIVACY NOTICE

Ancaster Group Limited is an automotive group registered in England No. 475853 and our registered office is 61 Croydon Road, Penge, London, SE20 7TF. This Privacy Notice explains how we use any personal information we collect about you when you use this website or contact us directly.

The Data Protection Act and the EU General Data Protection Regulations (GDPR)

The Data Protection Act and GDPR requires us to manage personal information in accordance with Data Protection Principles and in particular requires us to process your personal information fairly and lawfully. This means you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us in order that we may provide the product or service that you require.

All our employees are personally responsible for maintaining customer or employee confidentiality and will do their utmost to keep all data accurate, timely and secure. We provide training and education to all employees to remind them about their obligations.

What personal information do we collect?

We collect information about you when you register with us or when you make an enquiry or place an order for vehicle sales, parts, service, related products, or information, and when you apply for employment with us. We also collect information when you voluntarily complete customer surveys, provide feedback, participate in competitions or attend our events. Website usage information is collected using cookies and Google analytics, which may capture your IP address.

The personal information we collect from you will depend on the nature of your enquiry, the type of product or service you are enquiring about, or to satisfy any contractual or statutory obligation. This may include personal information, sensitive personal information, recorded voice conversations or CCTV images. Typically the information might include:

- Contact details (name, address, telephone / mobile numbers, email address)
- Photographic identification & proof of address documents (to carry out due diligence)
- Bank and financial details (to establish source of funds to pay for the product or service)
- Professional information (if you are applying for employment with us)
- Other information in order for us to fulfil your needs and complete the transaction
- By what methods you wish us to contact you.

Personal Information collected from 3rd Parties

Information may be passed to us from 3rd parties in connection with enquiries or products or services that you have expressed an interest in. An example of this is where you may have enquired about a new or used vehicle via a manufacturer or our

advertising partner suppliers, and we have that vehicle and are located in your geographic area.

We recognise that your personal information is confidential and we will protect the confidentiality of your information in accordance with our internal procedures and legal requirements.

On what basis will we process your personal information?

The basis for processing your personal information is:

- It is necessary for the performance of a contract
- It is necessary to comply with mandatory legal or statutory obligations
- It is necessary for Public Interest (or National Interest & Criminal Background Record checks as per DPA 2017)
- It is necessary to protect the vital interest of you or other persons, such as safety issues regarding your vehicle
- It is necessary for the purposes of our legitimate interests as data controller to continue processing your personal data in a way that we have previously done, however, we will ensure that this does not cause undue damage or distress to you
- Consent, whereby you have given us permission to use the personal data.

How we will use your personal information?

We may use your information in the following ways:

- to ensure the web site's content is presented as effectively as possible for you
- to provide the products, services and information that you have requested
- for our own internal record keeping
- to prepare documentation in order to complete transactions for our products and services, which may require sharing your data with 3rd parties
- to introduce you to other service providers* (us acting as a Broker) with whom you may form a direct relationship with, in order to deliver your product, service or information, such as finance or insurance providers (* see list below). Please note that if you form a direct relationship with that provider then they will become the data controller for the products or services they have contracted with you for, and their Privacy Policy will take precedent over ours.
- to maintain warranty plans, care plans, service plans, service history, mileages and details associated with your vehicle
- to develop and improve the products and services we offer, including those from selected suppliers* listed below, and notify you of these
- to review our employees interaction with you with a view to improve our performance by training and development.
- we will, with your consent, use your data for market research, marketing purposes, and independently assess how we did, and will always give you the option to withdraw this consent.

- we use CCTV images to protect our assets, and for security of you and our employees, and to detect criminal activity
- we use voice recording of telephone conversations for training purposes, to protect you and our employees from verbal abuse, and to ensure we have fully complied with your request for information, products or services
- in the event that you apply for a job at Ancaster Group, to assess your suitability for the role and to carry out any subsequent interview process
- to respond to complaints or allegations of negligence against us
- we may aggregate your information with other data so as to provide statistics in order to make business decisions and assess data about web traffic patterns, sales, demand for products, etc. This aggregated information does not identify any individual or individual's personal data.
- to data profile certain elements of personal information relating to average mileage over a period of time in order to notify you of when vital interest items may fall due, such as vehicle servicing, MOT reminders, Cambelt change due, brake pad replacement or worn tyres.

With whom will we share your personal information?

Personal information you have supplied may be shared with our manufacturing partners* and selected suppliers* (* see list below) so as to maintain the ongoing safety of your vehicle and any associated finance agreement, warranties, insurances, or other products or services linked to your vehicle, or its future care and maintenance. We may also share your data with our suppliers* subcontractors that may be based outside the European Economic Area (EEA) in countries that are not regulated by the GDPR rules. We will always use every reasonable effort to ensure our suppliers and their subcontractors provide sufficient protection to safeguard your personal information.

If you are taking out finance with your vehicle purchase the information you provide for the finance proposal will be disclosed to lenders for the purposes of considering your credit application. Lenders may use data profiling techniques to assess the level of credit and risk they are prepared to accept in making a decision as to lend money to you or not. Lenders may use your information to carry out searches with credit reference agencies. A record of those searches will be kept and may be used by other lenders in accessing applications from you and members of your household for credit in the future. Lenders will cross check this information with other lenders to help prevent fraud.

In limited circumstances we may disclose your information to third parties:

- if we are under a duty to disclose or share your information to comply with a legal or statutory obligation, or in order to enforce or apply our terms and conditions, or protect the rights, property or safety of our customers, employees or others.
- to fulfil certain compliance requirements, such as external auditor needs
- to our professional indemnity insurer in the event that a claim is made against us in order to defend ourselves
- to our regulators, including but not limited to the Information Commissions Office (ICO), the Financial Conduct Authority (FCA), in connection with any ongoing

regulatory investigation. This may involve the exchange of information with other companies or organisations for the purpose of fraud protection and credit risk reduction.

- any disclosure to law enforcement agencies where required by law
- in the event that the company goes into receivership
- if the company decides to sell all or part of its business via an asset sale, then the customer and vehicle database, including your data, will form part of the assets. Any prospective buyer will be subject to a non-disclosure agreement until such time as the transaction takes place and they provide satisfactory assurances that they comply with GDPR requirements.

How long will your information be stored for?

We will store your information in a secure and protected environment for as long as we believe it will better help us to understand how we can serve you and respect your wishes. However, this will be for a reasonable period and only for as long as is necessary. In addition, legislation might oblige us to store the information for a certain period of time.

Your Rights?

Under the Data Protection Act and GDPR you have a right:

- to be informed – as per this Privacy Notice
- of access – we will provide a copy of the data we hold about you within 30 days of receiving your request in writing – see address below
- to rectification – of any inaccuracies or omissions in your data
- to erasure and to be forgotten – whereby personal data is no longer necessary for the purpose it was originally collected, but subject to contractual, statutory or legal obligations
- to data portability – whereby personal data is transferred from one data controller to another at your request. It will be your responsibility to check that the receiving data controller complies with GDPR requirements and operates within the EEA.
- to restrict processing of the personal data, or withdraw consent in any or all of the areas previously given
- to object to processing based upon legitimate interest and/or direct marketing
- to be informed in relation to automated decision making and profiling – where decisions may be taken without human intervention,

What about Internet & Site Security?

The Internet is not a secure system and you should always be cautious about the information you disclose whilst online as there is a risk that it could be intercepted.

Personal Data Security

We take the responsibility for the security of your data very seriously. Your data will be held on secure servers within the EEA where possible, with all reasonable technological and operational measures put in place to safeguard it from unauthorised access. Where possible any identifiable information will be encrypted and transferred only by secure means.

Under what conditions might this privacy notice not operate?

In addition to directly providing your information to us, you might also provide Personal Information to other organisations that then forward it to us. The other organisations Privacy Notice will prevail until we deal with you directly. Any live “chat” session on our web site is hosted on a separate platform and therefore the Privacy Policy does not cover this type of transfer of your Personal Information. You should always be careful when distributing your Personal Information in this manner.

How to contact us?

If you have any queries, requests or complaints on the subject of data protection or would like to opt in or out of any contact or communications, please do not hesitate to contact our Data Information Officer at the address below: -

Data Information Officer

Ancaster Group Limited

Tornado House

164 Thornton Road

Thornton Heath

CR7 6BB

Email: dainformationofficer@ancaster.co.uk

Telephone: 020 8331 6479

Manufacturer partners and suppliers with whom we may share your personal data

- A10 Adaptations
- Absolute Results Productions Limited
- Aston Scott Limited
- Auto Protect (MBI) Limited
- Auto-Smart Solutions
- AutoTrader Digital
- B&M Automotive Repairs
- Barclaycard Merchant Services
- Black Horse Limited
- Bluesky Interactive Limited
- British Car Auctions Limited

- Call-It Automotive Limited
- Capitas Finance
- Car Care Plan (Motor Insurance Company Limited t/as)
- CDK Global (UK) Limited
- CIT Now
- Clarkson Wright & Jakes
- Close Brothers Business Finance
- Coopers Business Solutions
- Codeweavers Limited
- Contact Advantage
- Cox Automotive Retail Solutions
- EMaC Limited
- Enterprise Rent-A-Car
- Epyx Limited t/as 1Link
- Experian Limited
- Experience GB
- Facebook Ireland
- Fiat Auto Financial Services
- Fiat Chrysler Automobiles UK Limited
- FISC Limited
- Google Adwords
- Haymarket Media Group Limited
- HPI Equifax Limited
- Hyundai Car Finance Limited
- Hyundai Motor UK Limited
- HIS Global Limited t/as iConnect
- I-Comply Online Limited
- IFM Europe Limited
- JudgeService Research Limited
- Key Communications Services Limited
- Lloyds Cardnet Merchant Services
- Manheim retail Marketing
- Mapfre Abraxas
- Marketing Delivery Limited
- MILS Legal Limited
- Motability Finance Limited
- Motors.Co.uk
- Nissan Event
- Nissan Assured Extended Warranty
- Nissan Motor (GB) Limited
- Oak Innovation Limited
- Onwatch Plc
- Paddock Wood Auto Repairs
- Pinnacle
- Premia Solutions
- RAC

- RCI Financial Services Limited
- Retail Motor Industry Federation
- Reynolds and Reynolds Limited
- Rhino Design (Manchester) Limited
- RLA Group Limited
- Royal Mail
- RTF Networks
- Supagard
- TBWA
- Trigion Security Services Limited
- UHY Hacker Young
- V Cars
- Viridor Waste Management Limited