

# Privacy Policy

This is the Privacy Policy of Ravenscroft Motor Company Limited. We respect the privacy of our customers and are registered under the Data Protection legislation. This policy only applies to our websites and not to the websites of other companies.

## Introduction

Welcome to our privacy notice.

We, at Ravenscroft Motors respect your privacy. We are committed to protecting your personal data. This privacy notice informs you about how we look after your personal data when you visit our website and tells you about your privacy rights and how the law protects you.

This privacy notice is provided as a pdf document, you can download a pdf version of the policy at [www.ravenscroftmotors.com/privacy-policy.pdf](http://www.ravenscroftmotors.com/privacy-policy.pdf). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## 1. Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data through our dealings with you, including any data you may provide over the phone or otherwise deal with us in the course of business.

This website is not intended for children and we do not knowingly collect data relating to children.

### Controller

Ravenscroft Motor Company Ltd is the controller of and responsible for your personal data (collectively referred to as "RMCL", "we", "us" or "our" in this privacy notice).

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

### Contact details

Our full details are:

Full name of legal entity: Ravenscroft Motor Company Limited

Contact Name: Jackie Lambden

Email address: [accounts@ravenscroftmotors.com](mailto:accounts@ravenscroftmotors.com)

Postal address: 57/61 Fleet Road, Fleet, Hampshire. GU51 3PJ

Telephone number: 01252 942695

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25th May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and/or transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes name, job title and company name (if company purchase).
- **Contact Data** includes company address (if company purchase) or residential billing and delivery address (if consumer purchase), email address.
- **Financial Data** includes bank account, payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Profile Data** includes your identifying customer number, purchases or orders made by you.
- **Communications Data** includes all correspondence that you may have with us whether by email or post or otherwise.

### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel the contract you have with us but we will notify you if this is the case at the time.

## 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Correspondence and Financial Data by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you :
  - wish to buy our services;
  - give us some feedback.
- **Third parties.** We may receive personal data about you from various third parties and public sources as set out below:

- Contact from job providers
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (i.e. where you wish to buy our services).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us on 01252 942695 or [accounts@ravencroftmotors.com](mailto:accounts@ravencroftmotors.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| <b>Purpose/Activity</b>   | <b>Type of data</b>   | <b>Lawful basis for processing including basis of legitimate interest</b>   |
|---|---|---|
| To register you as a new customer   | (a) Identity<br>(b) Contact<br>(c) Communications                                     | Performance of a contract with you  |
| To contact you by phone   | (a) Identity<br>(b) Contact   | Necessary for our legitimate interests in providing our services to you   |
| To carry out our services arising out of any contracts arising between you and us including:<br>(a) Manage payments, fees and charges<br>(b) Collect and recover money owed to us | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Communications | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to include recovery of any debts due to us) |
| To manage our relationship with you which will include:   | (a) Identity<br>(b) Contact   | (a) Performance of a contract with you  |

|  |                                   |   |
|--|-----------------------------------|---|
| (a) Notifying you about changes to our terms or privacy policy | (c) Profile<br>(d) Communications | (b) Necessary to comply with a legal obligation<br>(c) Necessary for our legitimate interests (to keep our records updated) |
|--|-----------------------------------|---|

## 5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties
- We do not sell your personal data to third parties.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact Jackie Lambden on [accounts@ravenscroftmotors.com](mailto:accounts@ravenscroftmotors.com)

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## THIRD PARTIES

### External Third Parties

- Service providers acting as contractors who provide specialist services.
- Professional entities based in the United Kingdom who provide hosted professional software services, specifically including automotive and financial services products.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on these grounds as you feel it impacts on your fundamental rights and freedoms

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data.

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

## **Privacy Policy**

We're giving you this information as part of our initiative to comply with recent legislation, and to make sure we're honest and clear about your privacy when using our website and our services.

We monitor developments with privacy best practice closely and if we think changes would be of benefit to you we'll make a change to our policy.

