

## **Privacy Policy**

### **The Policy**

This privacy policy sets out how we gather, use, hold, share, disclose and protect (“process”) any personal information that you give to us when you use W H Brand Ltd. By continuing to use W H Brand Ltd you are accepting this policy.

Some personal data information is essential to W H Brand Ltd functioning and our supplying a service to you. If you do not wish to allow us to process your data then you will not be able to use our services.

Useful contact details and a summary of the control you have over your personal data can be found at the end of this policy.

### **Compliance**

In processing personal data, we will comply with relevant legislation in force from time to time in the UK. We may change this policy, without notice from time to time by updating this policy as we improve our service to you and as relevant Data Protection legislation comes into force. Your personal information will continue to be held in accordance with our policy as it develops. We will not reduce your rights under this policy without your explicit consent.

### **Legal Basis for Processing**

#### **Likely Processing**

We gather data on two groups,

- I. the non-registered viewer of our website in which our services are described (“Viewer”),
  - II. those making enquiries for test drives and for other information (“Enquirers”)
  - III. our Customers applying for finance or other applications (“Customers”)
- Where you are merely a Viewer we will normally only gather data indirectly but might also do so directly if you i) request further information from us ii) engage with us on social media as examples.
  - Where you are our Enquirers or Customers we will gather data indirectly and directly.

#### **Lawful Basis**

We are required to process your personal data in a lawful, fair and transparent manner.

Consent – where you are a Viewer you will be accepting our cookie policy in order to continue to view how our services operate. We detail below the extent of indirect use of data which is anonymised and is not designed to identify you individually.

Contract – where you are Customers inquiring about obtaining finance or entering into a contract with us in, or during the process of registering with us, we process data necessary to answer your enquiry and process your account in order to provide you with these services. Our service may include being in contact with you as follow up even after your initial question has been answered, to maintain your registration with us including carrying out verification checks.

Legitimate Activities – where we are required to store or use information for legal purposes, for example where you are requesting a test drive or we are following up a vehicle purchase with MOT reminders or you have been a Customer for contractual purposes as above, we do so as part of our legitimate activities as a lawful business.

#### **Data Controller and Processor**

W H Brand Ltd makes the decisions concerning how personal data through W H Brand Ltd is processed. Accordingly we are the Data Controller for your personal information. Therefore we should be your first point of contact.

W H Brand Ltd uses a third party, Autoweb.co.uk Ltd, to help power its website and Customer contact management system. This provides you with an improved service and better user experience. They process your personal information as set out in this policy and they do so under our direction. Accordingly they act as a Data Processor. Should you have any concerns about this please do not hesitate to contact us.

#### **W H Brand Ltd's Website Anonymous Tracking**

Some personal data may be processed by us when you are merely browsing W H Brand Ltd's website.

#### **Cookies**

You can choose to accept or decline cookies from our website.

A cookie is a small file which is placed on your device when you visit a website. The file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies help us provide you with a better website by tailoring the website operations to your needs and to respond to you as an individual user such as identifying which pages you find useful and which you do not.

Such a cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and does not identify you individually.

Merely by browsing our website, W H Brand Ltd tracks your use so that we can offer you a better user experience relating to your navigation habits. This helps us analyse data about social media traffic and improve [Autoweb Customer] in order to tailor it to the needs of our customers.

### **Website Tracking Technology**

Our website uses tracking technology to help us to analyse user behaviour.

Google Analytics is an example of this technology. It is an analysis service by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. Google Analytics allows us to analyse the use of our website application usage.

The information about your visit collected by Google Analytics is usually transferred to a Google server in the USA and saved there. Google will use the information collected on behalf of the application operator to evaluate the users' use of the application, to compile reports about the users' activities within this application, and to provide further services for the application operator related to the use of the application.

You can find more information about what data can be collected via Google Analytics at <https://support.google.com/analytics/answer/6004245?hl=en>

By using the website, the user explicitly consents that his or her information is collected via Google Analytics.

### **What we might collect**

W H Brand Ltd collects the following types of information.

- identification of your past and current use of W H Brand Ltd's website
- technical information from your device to enable it to interact with our system
- information about your visits including page response time, pages visited, methods of browsing and similar

### **Direct Information Gathering**

Some personal data may be processed by us when you have requested a product or service from us, whether as part of an agreement to purchase from us or merely requesting further contact from W H Brand Ltd.

### **Risk and Personal Data**

Please note that sending information over the internet is not completely secure and we cannot guarantee the security of your data while it is in transit. *Any data you send is at your own risk. Please do not include sensitive personal data sent over the internet.*

### **What we might collect**

- name
- contact information including postal address, email address and telephone contact details depending on the service you are requesting
- demographic information such as post code and location
- other information relevant to your existing car, vehicle and price preferences, driving licence status, availability
- interest in customer surveys and/or offers

### **Compilation of Data**

In order for the vehicle search function on [Autoweb Customer] to operate, it is essential that we hold onto and connect data together to identify you and your preferences. This will include location data, your name and similar information, demographic information (for example the number of seats required), price or finance options.

### **Location Data**

We use a third party provider to recognise and populate postcode searches. Holding of this data including search histories is held in accordance with the privacy policies of these third parties. We use our reasonable endeavours to ensure that such policies will not diminish your rights. We do not link historical searches with your name.

### **Financial Information**

If you are requesting a finance option on-line then we will redirect you to a third party provider's website. They will have their own privacy policy that you will need to consider when supplying information to them. You should assure yourself that you are content with their policy as you will be supplying sensitive data to them. Please note that we do not control these third parties and cannot take responsibility for their handling of your personal financial information.

### **Testimonials**

We would be delighted if you would provide us with testimonials of your great experiences with us. We will review these before placing them on our marketing literature including our website and will only use your first name or an assumed name if you so wish. Should you wish for your testimonial to be removed please let us know using the contact details provided below.

### **Customer Experiences**

We may also keep data to record the appreciation shown by a customer and their experiences. This is for internal purposes to enable us to check that we continue to provide an excellent service. If the record is initiated by us then we will anonymise it, using only first names.

Should the record be initiated as a result of a request or complaint by you then only essential information relating to the issue will be kept and in that event for no longer than **[3]** months unless you request otherwise. After **[3]** months we may retain information showing the fact of the request or complaint for training purposes but the information will be anonymised.

### **What we do with the information we gather**

We take different types of information from you. Processing of anonymous data is either stored on your device and not accessed by us (e.g. cookies) or informs our statistical analysis on website and page use (e.g. traffic cookies, Google Analytics).

Processing of your personal information involves a number of different actions depending on why you have supplied us with information:

#### **Storage**

The information we hold about you may be stored outside the European Economic Area in order to process your data.

Initially your personal information is held securely by Autoweb. They would not normally view or use your personal information unless there is an issue with the use or security of holding your data.

In normal circumstances your information is held by W H Brand Ltd for a maximum of **[3]** months or indefinitely if you have opted in or there is another basis for holding your data

#### **Anonymous Tracking**

We use anonymous tracking to,

- to customise our website according to your preferences and tastes
- to improve how we display information on our products and services on our website for your benefit and in keeping with your device
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

#### **Initial Response**

We require your personal information to handle our initial response with you. To improve your customer experience, and based on feedback we receive, we may vary from time to time the types of information we ask for. Common types of information we ask for might include:

Location Data: we take your location details in order to inform you where we are located closest to you and how you can travel to us. This will also inform us of where your local dealer is and enable us to further handle your personal information accordingly.

Vehicle search: the data we compile from you relating to your vehicle searches enable us to provide you with immediate search results automatically generated. Further compilation of your data is likely to be done by your local dealer when reviewing an expression of interest by you in order to make further suggestions. Such further searches may be intuitive rather than automated.

Brochure Requests: we take your name and address to accurately send to you our latest sales brochure.

Test Drives: we take your name and address to enable you to come and test drive one of our cars. In addition we may require you to supply beforehand information related to your lawfully being allowed to test drive one of our cars. We may need to hold this information for an extended period for legal reasons in order to deal with any complaints that arise from the test drive or to supply to our insurance company. Details other than your name and address will be kept differently.

Finance Application: we don't take your personal financial details but direct you to a third party who will take a number of details concerning your financial status. We work closely with this third party but we are not the same company and you must assure yourself that you are content with their privacy policy.

### **Further Processing**

Once information is received by us it is stored centrally. We then use location data to supply your local dealer with a copy of your contact details and other information relevant to your request in order for them to be in contact with you.

The personal information enables our dealer:

- to operate the W H Brand Ltd customer service and respond to your enquiry
- for internal record keeping, to follow up your enquiry at times convenient to you. This may mean that your local dealer i) attempts multiple contacts with you to fulfil your requests for contact ii) holds your data for up to **[3]** months to answer any follow up discussed with you

After a period of 3 months your local dealer will delete your personal information from its local records.

### **Supplying your data to third parties**

Where we must share your data for the purposes of providing you with the services you have requested we will use reasonable endeavours to put in place contractual and practical systems to protect your personal information securely. Further we will notify them of any preferences you have indicated concerning use of your personal data.

### **Future Marketing**

- depending on your consent we may periodically use your contact details to send you promotional emails or texts about new products, special offers or other information which we think you may find interesting using the contact details which you have provided
- depending on your consent to contact you, using your contact details, for market research purposes
- depending on your consent, supply of your contact details to third parties for use with related marketing messages

Your data will be initially held with Autoweb for up to 30 days from date of enquiry and then deleted. Marketing data is accessible separately from other information we might have relating to you.

### **Request for Deletion of information**

If you have provided your consent to receive future marketing messages then we will hold this information until you indicate that you no longer wish to receive messages from us.

If you contact us to indicate that you no longer wish to receive messages from us we may store that indication centrally.

### **Contracts with you**

We would not normally use information obtained via our website to finalise contracts with you. Such information will be held in separate records. In the event that such personal information is used to enter into contracts with you it will be transferred and its accuracy checked in that process. Should such data be used to assist in purchases made with you then that information may be held as part of our accounting records held by us for compliance purposes. Only data sufficient for these purposes will be held and this data will be held securely and is kept separately and only for the purposes of tax compliance.

### **Business Purchase or Sale**

Please note that if the business were to be sold or transferred or we were to purchase another business, your data will be transferred with it but only as part of the business as sold or transferred. Your personal information may be disclosed to a prospective buyer or seller of such business.

### **External Sites and Social Media**

When you connect to or from W H Brand Ltd using external websites please be careful to check whether the external site is one controlled by us (usually our social media spaces on platforms such as Facebook, Twitter or LinkedIn) or those used by third parties. We cannot control the information practises of other companies and organisations that might advertise, display, link to, or offer to obtain our goods or services for you. We cannot take responsibility for, cannot control and this policy does not cover spaces on the internet not controlled by us.

### **Linking to other websites**

Similarly our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Note also that third party cookies might be downloaded onto your device as a result of your use of this website, for example if you were to send information to or from this website to your social media account your account may require the use of such cookies to enable this transfer to take place. These cookies are not under our control and we disclaim any responsibility for the acts of third party cookies.

### **Posting Comments & Social Media**

Please note that if you choose to post comments on this website or via our social media accounts containing personal data we cannot accept responsibility for the use or misuse of such data by others who have access to such posts and we suggest that you consider carefully before posting any such data. Please note that we may review tracking data generated by social media providers such as Facebook for measuring how useful our social media presence is for you.

### **Social Media Data Gathering**

We employ technology to help us identify when you might have encountered us through social media or to send you targeted marketing messages relating to products we have to offer during your social media experience. The use of this technology does result in our holding your personal contact details and likes and dislikes. We do not categorise this information based on what the law describes as “sensitive personal data”.

### **Facebook as an example of Social Media Integration**

W H Brand Ltd’s website integrates with different social media to the benefit of communicating with you. In order to explain how some social media works we have set out below one example of how your data is used in this case by Facebook. Other social media use your data in different ways and you should review the privacy policy of each provider should you be concerned.

The social network Facebook is headquartered at 1601 South California Avenue, Palo Alto, CA 94304, USA. Facebook is used to share activities on Facebook and to get Facebook information about [Autoweb Customer] users. An overview of Facebook integrations and social plugins can be found here: <http://developers.facebook.com/docs/plugins/>.

When users enable the Facebook connection in their settings, the Facebook integration establishes a connection between a user's device and the Facebook server. Thereby, W H Brand Ltd receives information about the user.

When users invite friends via Facebook, the Facebook integration establishes a connection between a user's device and the Facebook server. That allows the user to gain information about his or her friends via W H Brand Ltd Facebook page. W H Brand Ltd as the provider of the W H Brand Ltd Facebook page does not receive any of this information.

When users share their information on Facebook and when they invite friends via Facebook, the Facebook integration establishes a connection between a user's device and the Facebook server. Thereby, the user links information on W H Brand Ltd Facebook page to his or her Facebook account. That allows Facebook to correlate a user's usage of W H Brand Ltd's facebook page with the corresponding user's Facebook account. W H Brand Ltd as the provider of the W H Brand Ltd Facebook page does not have any knowledge of the future data usage by Facebook. Users can find more information on that issue in the privacy policy of Facebook at: <http://www.facebook.com/about/privacy/>.

Users have to actively enable the Facebook connection in their Settings in order to be able to share information on Facebook and invite friends via Facebook. If users do not want Facebook to gain information on their W H Brand Ltd usage or if they don't want W H Brand Ltd to gain information about them via Facebook, they should leave the Facebook integration disabled as it is in the default settings. Once enabled, users can disable the Facebook connection again in their Settings at any time.

By activating the Facebook connection in his or her settings, the user explicitly consents to the information exchange described in this section. Any data arising from the use of Facebook will be located outside the EEA and subject to transmissions between the EEA and elsewhere.

## **Controlling your personal information**

### **Your Rights**

Data Protection legislation gives you certain rights to control of your personal data. These are:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability

7. The right to object
8. Rights in relation to automated decision making and profiling

Further information on these rights can be obtained from the UK Information Commissioner whose website is at: [www.ico.org.uk](http://www.ico.org.uk)

We fulfil these rights in the ways set out below however we do reserve our right to continue to process your data or refuse your requests as set out in relevant legislation.

## **Privacy Policy**

By detailing the information we gather and process in this Privacy Policy.

## **Cookies**

You can choose to accept or decline cookies from our Website. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

However, if you block cookies, you will not be able to use all the features on our website and may not be able to use our platform.

## **Consent**

You have control over the information you supply to us whether by:

- i) consent gained from your continuing to browse our site, or
- ii) your explicit consent by completing a contact form whether for requesting [a test drive, requesting a brochure seeking finance], or
- iii) your explicit consent to further processing to send you ongoing marketing material concerning our [cars, offerings and services], or
- iv) by your contacting us about your personal information as described below.

Consent for the direct purpose for which you supply your data will be inferred from the situation in which you give this information. If you choose to withdraw your consent to the processing of your personal information at any time then you should inform us in writing using our contact details below.

## **Data Requests**

You may request details of personal information which we hold about you under the relevant Data Protection legislation in force at the time (a "Data Subject Access Request"). If you would like a copy of the information held about you, please email us.

## **Data Correction, Complaints & Deletions**

If you believe that any information we are processing on you

- is incorrect or incomplete, (perhaps for example because you have seen your name spelt incorrectly or someone else has received a call meant for you) or
- is being mis-used (perhaps for example a company you don't know has contacted you using information you supplied to us and you didn't agree to this), or
- should no longer be processed by us (perhaps for example because you no longer wish to be contacted)

then please email us as soon as possible. We will promptly correct or delete any information found to be incorrect or no longer necessary and deal with your complaint.

We ask that if you have any concern you first approach us via our contact email address [sales@whbrand.co.uk](mailto:sales@whbrand.co.uk) or telephone number 01406 330265.

Should you wish to take the matter further we ask that you contact us in writing setting out your concerns in detail to enable us to provide you with an effective response.

## **Lawful Disclosure by Us**

Please note that you hereby provide your consent and in any case we may be required to disclose your data to lawful authorities for the prevention of crime or regulatory purposes or a court as such court requires. In some circumstances we may not be permitted to inform you that we have made such a disclosure.

## **Contact Details**

W H Brand Ltd is the trading name of W H Brand Ltd whose registered office is at 77 Broadgate, Whaplode Drove, Near Spalding, Lincs, PE12 0TN

Our contact email address is [sales@whbrand.co.uk](mailto:sales@whbrand.co.uk). Our address and contact for written correspondence is 77 Broadgate, Whaplode Drove, Near Spalding, Lincs, PE12 0TN

Any Data Subject Access Request should be made to the following email address [sales@whbrand.co.uk](mailto:sales@whbrand.co.uk)