

This privacy policy describes how Steve Andrew car sales ("**we**" or "**us**") uses personal data relating to our website. It also describes how we use cookies on our website. Individuals whose data we collect and use are referred to in this policy as "**you**".

We may update this policy from time to time. It was last updated in March 2023.

This policy is set out in the following sections:

1. **Who we are**
2. **What data we collect and how we use it**
3. **Sharing your data**
4. **International data transfers**
5. **Retaining your information**
6. **Your rights, including your right to access a copy of the data we hold**
7. **Our contact details**

1. WHO WE ARE

Steve Andrew car sales, Alma Martin way, Bardney, Lincoln LN35TF

- **Our activities as a controller:** We act as a 'controller' for the purposes of data protection laws in our use of your data for our own business purposes. This means that we determine how and why your data is collected and used, for example in managing customer and business relationships, marketing our services, dealing with enquiries, and running our business.

This policy is primarily about our activities as a controller, and more information is provided below.

- **Our activities as a processor:** In providing our services, we also hold some personal data as a 'processor' on behalf of our customers, which means such data is used for purposes determined by us. This includes, for example, our use of information about individuals on or collected via our websites, and as part of client marketing activities which we facilitate as part of our services.

2. WHAT DATA WE COLLECT AND HOW WE USE IT

2.1 Our customers

We hold personal data relating to our customers. Such personal data typically includes:

- Name
- Contact details (such as postal address, email address and telephone number)
- Account and bank details
- Vehicle information
- Other personal data (including any private details provided) within communications with you

We use your data in order to manage our relationship with you, and to administer our services to individuals.

Our legal basis under data protection law for using your personal data is our legitimate interests in carrying out the activities described above.

We generally obtain these details directly from you. In some cases, initial contact details or information may be obtained from other parties who have recommended you as a customer, or from other business sources, such as information provided on your behalf (such as finance provider).

We collect data and information about individuals, handle enquiries from individuals, make sales to individuals, assist in handling payments for individuals, and have other interactive content. We also use cookies to collect information about use of the website.

- We store and process information from or relating to our website within our content management and, or our dealer management systems (CMS and DMS)
- We may share with our clients and partners details of leads via email, which have been captured by our website

In these cases, we collect, use and store (and share with our clients) personal data and related information on behalf of our clients, for the purpose of providing these services. Such personal data may include names, telephone numbers, email addresses, content of enquiries, details of sales, data collected by cookies, and other content of communications.

2.2 Our suppliers and service providers

We hold personal data relating to our contacts at organisations which supply or may supply us with goods or services. Such personal data typically includes:

- Name
- Contact details (such as business postal address, email address and telephone number)
- Personal data within communications with you or your organisation
- Finance and billing details (for example where you are self-employed or a sole trader)

We use these details to manage our relationship with you or your organisation, and to administer matters relevant to the goods or services being provided.

Our legal basis under data protection law for using your personal data is our legitimate interests in carrying out the activities described above.

2.3 Enquirers and business contacts

Other business contacts may include enquiries or visitors to our website or business, or people who contact us over social media. Personal data which we hold typically includes:

- Name
- Contact details (as relevant to your enquiry or visit)
- Information specific to your enquiry or visit (or other relevant contact), including information you provide in the enquiry box on our website
- Personal data within communications with you

We use such details for the purpose of handling or administering your enquiry, visit or purchase, and as may be relevant to the circumstances of our relationship with you.

Our legal basis under data protection law for using your personal data is our legitimate interests in carrying out the activities described above.

2.4 Google Analytics and use of cookies

- **Website analysis:** We use Google Analytics to collect standard internet log information and details of visitor behaviour patterns. This assists us to understand how visitors engage with our website, by looking at statistics such as the number of visitors to the various parts of the site at different times. Google Analytics uses cookies in order to obtain this information. This information is processed by us in a way which does not seek to identify anyone.
- **Functional cookies for form submission:** We use Google ReCaptcha for form submissions to protect our website from spam and abuse. Google ReCaptcha uses cookies in order to provide this service.

Except to the extent they are strictly necessary for the provision of our services, cookies will only be used if we obtain your consent. You will be given options when you first visit our website and can change your preferences at any time. If you do not provide your consent, you may not be able to use certain aspects of the site (such as communicating with us by completing a webform). You can also disable cookies using your browser's privacy settings. More information about our use of cookies is set out in our Cookies Policy.

2.5 Use of data for other standard business purposes

Your personal data may also be used by us:

- to maintain appropriate records of our business communications and relationships (in our legitimate interests); and
- to protect or enforce legal rights, or for other purposes permitted or required by law, including data protection law (in our legitimate interests, or as needed to comply with a legal obligation)

2.6 Sensitive personal data

We do not generally hold sensitive categories of data about customers and other business contacts described above (for example, information about health, racial or ethnic origin, or criminal convictions). If any such data becomes relevant (for example if you provide us with information about any special needs which you have relevant to our relationship), we will assess our legal responsibilities at that time and, where appropriate, provide you with additional information about how we may use such data.

3. SHARING YOUR DATA

3.1 Our service providers

Our service providers may handle your data, such as our data centre and technology service providers. They act as processors on our behalf, meaning that we remain primarily responsible for how they use your data on our behalf in line with the purposes and legitimate interests identified in section 2 above.

3.2 Other parties

We may also share your data, where relevant, with the following parties:

- legal authorities or regulatory bodies;
- our legal or other professional advisers;
- prospective or actual purchasers of our company or business;
- other parties to the extent needed to progress an enquiry or request from you, or to provide a service requested by you or your organisation, or if you have consented to us doing so; and
- other parties where we are otherwise required or permitted by law to do so (including by data protection law).

Our legal bases for such data sharing are, as appropriate, our (or the recipient's) legitimate interests in the relevant activity, compliance with a legal obligation, or your consent.

4. INTERNATIONAL DATA TRANSFERS

At the date of this policy, we do not transfer your data outside the UK and the European Economic Area (within which organisations are subject to the UK GDPR or the EU GDPR, which provide protection for and give you rights in relation to your personal data).

5. RETAINING YOUR INFORMATION

We will retain your personal data for as long as we need it for the relevant purposes specified above, in accordance with our records retention procedures. Please contact us (using the contact details at section 7 below) for further information about these.

6. YOUR RIGHTS

In accordance with data protection laws, you have certain rights in relation to our use of your personal data. These rights include the following:

- to obtain a copy of the personal data we hold about you, together with other information about how we process it (known as a subject access request);
- to withdraw any consent which you have given relating to the use of your data;
- to request rectification of inaccurate or incomplete data, and, in some circumstances, to request us to erase or restrict our use of your data, or otherwise to object to our processing of your data for direct marketing purposes or for reasons relating to your particular situation;
- where our use of your data is based on your consent or necessity for our contract with you (described as the 'legal basis' in the relevant sections above), to exercise a right to data portability, in order to transfer sets of data provided by you and held electronically to another organisation;
- not to be subject to a decision based solely on automated processing, which significantly affects you, unless additional legal requirements are met; and
- to make a complaint about how we handle your data to the UK Information Commissioner's Office. Please visit www.ico.org.uk for further information about how to do this (and further guidance on your rights).

Please contact us (see section 7 below) to send us requests to exercise these rights (specifying what you are requesting), or if you would like further information about these and other rights which you have.

Note that there are certain limitations and exemptions to these rights which we may apply depending on the circumstances.

7. OUR CONTACT DETAILS

Post: Steve Andrew car sales, 2 Alma Martin Way, Bardney, Lincoln, LN35TF

Or contact us via one of our enquiry forms.