

Company Vehicle Solutions Ltd – Privacy Policy

We are Company Vehicle Solutions Ltd, and our registered office is at Highfield, Garth Farm, Llangwstenin, Llandudno Junction, Conwy, LL31 9JF. Company number 4490088, registered with the ICO under data controller number Z7257888.

We are committed to compliance with all relevant UK and EU laws in respect of personal data, and to protecting the “rights and freedoms” of individuals whose information we collect in accordance with the General Data Protection Regulation (GDPR).

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The reform sets out more rights for individuals and greater transparency in how personal data is processed by Data Controllers, such as consent, distribution, marketing and deletion. As we are a credit intermediary, we undertake a number of financial tasks that relate to consumer credit. Our lawful basis for processing your personal data is done so under: *Legitimate Interest - Article 6(1)(f) – “the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.”*

Company Vehicle Solutions Ltd has one Data Controller: Ann Baker

What information we collect and hold

- We will obtain personal data about you (including your name, address, date of birth, contact information, interests, payment details, financial information and opinions) and those whose personal data you have with express authority disclosed to us.
- Whenever you complete a proposal form or make a telephone enquiry with us to receive our services. If you submit an online enquiry you will be required to agree to the terms of this Policy which include permitting us to contact you for the purposes of the finance related enquiry via the contact means of which you provide us with the details of. i.e. email address, telephone number, etc.
- We will obtain personal data when you contact us for any reason, or to purchase services. In certain circumstances, we may hold sensitive personal data if you provide us with such information if you feel that it is relevant for the purpose of your enquiry, but we will not ask for such information. Any sensitive personal data obtained and recorded will only be done so with your explicit consent.

How we use personal data

We use personal data to assist us in processing your enquiries and obtaining the services which you require.

- To assist us in processing your enquiries and obtaining the services which you require.
- To help us identify you and any accounts that you hold with us undertaking credit checks.
- Administration.
- Send you marketing emails if you have requested it, you can inform us at any time if you no longer require marketing emails.
- Fraud prevention and detection.
- Contact you via phone to follow up emails or direct mail marketing, you can inform us at any time if you no longer require marketing contact.
- Billing and order fulfilment.

- Our agents/service providers to contact you regarding service, MOT reminders and safety recalls. You can inform us at any time if this is no longer required.
- Security vetting.
- Improving our services.

Who we may share your information with

We may disclose personal data which you provide to us to other third parties such as potential funders, eg Lex Autolease, Arval, with whom we deal with in the course of providing our services to you. Please be aware that we will not sell any personal data provided to us to any other party.

- We may disclose your personal information to any of our staff, suppliers or agents where it would be reasonable to do so. If consent is necessary to facilitate this sharing we will ensure it is obtained prior to processing.
- We may be legally obliged to disclose information by law.
- In connection with any ongoing or prospective legal proceedings.
- In order to establish, exercise or defend our legal rights, including providing information to others for the purposes of fraud prevention and reducing credit risk.
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- Except as provided in this policy, we will not provide your personal information to third parties.

How we use Cookies

Cookies are used by web servers to identify and track visitors as they navigate through different pages on a website, and they identify users returning to a website they have previously visited.

We may collect information about you via Cookies however the information collected relates to your visit, and includes information such as what browser you have used, how long you remain on our website and other non-personally identifiable information.

We may use the information we obtain from Cookies for the following purposes:

- To recognise repeat visitors.
- To improve the websites usability and functionality.
- To analyse the use of our website.
- To help with administration of the site.

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.

You can choose to accept or decline Cookies. Most web browsers automatically accept Cookies, but you can usually modify your browser setting to decline Cookies if you prefer. This may prevent you from taking full advantage of the website.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about the website using Cookies. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

Our site may, from time to time, contain links to and from the websites of our suppliers or affiliates. Company Vehicle Solutions Ltd is not responsible for the content of any websites that are linked to its site. When entering a

third-party site, it is your responsibility to ensure that you read the privacy policy and legal terms & conditions that apply to that site.

Security of personal information

By submitting your personal information, you agree to us storing and/or processing your data.

We are committed to ensuring that your information is treated securely and in accordance with this privacy policy. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

Whilst we will use all reasonable efforts to safeguard such personal data, you acknowledge that the use of the internet and email is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which is transferred from you or to you via the internet or email.

Marketing and opting-in

You will be given the opportunity to opt-in or opt-out to having your contact details used for marketing purposes. The nature of these marketing communications relate to information on products, services, promotions and special offers which we believe may be of interest to you or others.

If you have opted-in to receive our marketing material, we will ensure that it is relevant to your requirements. If you no longer wish to receive email or other promotional materials from us, you may opt-out of receiving these communications at any time by one of the following methods:

- by replying to the email with 'unsubscribe' in the subject line.
- by calling us on 01492 541212.
- by writing to Ann Baker, Data Controller, Company Vehicle Solutions Ltd, Highfield, Garth Farm, Llangwstenin, Llandudno Junction, Conwy, LL31 9JF.

Your rights

You have the right to request access to your personal data which we process. This formal request is made under the DPA and is referred to as a Subject Access Request. If you wish to exercise this right and make a Subject Access Request, you should;

- Put your request in writing either by email or by letter.
- Include proof of your identity and address, e.g. a copy of your driving licence or passport, and a recent utility or credit card bill.
- Specify the personal data you want access to, including any account or reference numbers where applicable.

You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right, you should:

- Either speak to us via telephone or put your request in writing.
- Provide us with enough information to identify you, e.g. account/order number, username, registration details.
- Specify the information that is incorrect and what it should be replaced with.

You also have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right you should:

- Put your request in writing, an email sent to ann@companyvehiclesolutions.co.uk with a header that says 'unsubscribe' is acceptable.
- Provide us with enough information to identify you, e.g. account/order number, username, registration details.
- If your objection is not to direct marketing in general, but to marketing by a particular channel, e.g. email or telephone, please specify the channel you are objecting to.

Data retention

We will only process your personal data providing you have given your consent for us to do so. Under the provisions of the DPA, our firm's lawful basis for processing personal data is based on a *Legitimate Interest*.

- We will retain your personal data for as long as you are a customer, to enable us to provide our services to you, and 4 years thereafter.
- We will retain a record of all the vehicles we have supplied you, under your business name, or personal name if applicable, no other personal data will be in any way linked to this file.
- If you have made an enquiry about our services & opted in to receive our marketing material we will keep your data till otherwise instructed.
- If you have made an enquiry about our services & not opted in to receive our marketing material we will keep your data for 4 years.
- We will contact you on an annual basis to ensure all data is still correct.
- If you wish to become a member of the Bonnie Tyler fan club please contact us for further details!

International transfers

In the normal course of business there may be a need for Company Vehicle Solutions Ltd or any other firm associated to the business, usually when processing an application for credit, personal data would have to be transferred outside of the European Economic Area (EEA) where those countries do not typically have the same protections and safeguards in place for the protection of personal data to those countries within the EEA.

Company Vehicle Solutions Ltd deal with a number of large, international corporations where data is likely to be transferred in this way. Assurances and processes will always be put in place and considered before any international transfer to a non-EEA country is undertaken to ensure the protection and security of the personal data.

Our contact details

We welcome your feedback and questions.

If you wish to contact us, please send an email to ann@companyvehiclesolutions.co.uk, or you can write to us at Company Vehicle Solutions Ltd, Highfield, Garth Farm, Llangwstenin, Llandudno Junction, Conwy, LL31 9JF, or call us on 01492 541212.

We may change this Policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version which will apply each time you deal with us.