

PRIVACY POLICY

September 2019

About this policy

This policy describes how we use your personal data when you use our website, buy our goods or when we provide services to you, or if you enquire or apply for a job opportunity with us. We have provided this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it which are also explained.

You can read, print and save this whole policy. We use sub-headings to help you find specific information that you may be looking for more easily, including information about:

- Who we are and how you can contact us
- Our Data Protection Officer
- What personal data we collect about you
- What we use your personal data for
- Cookies
- Consent and other legal grounds for processing your personal data
- Personal data you are legally obliged to provide
- Your rights to know what personal data we hold and to control how we use it
- Automated decision making and profiling
- When we will share your personal data with others
- How we keep your personal data safe
- How we use your personal data for marketing
- When we will send your personal data to other countries
- How long we keep your personal data
- How you can make a complaint
- How we keep this policy up to date

Who we are and how you can contact us

We are John Grose Group Limited, a limited company with registered number 01491537. Our registered and head office address is at Whapload Road, Lowestoft, Suffolk NR32 1NN.

You can contact us in writing at John Grose Group Limited, Ransomes Europark, Ipswich, Suffolk, IP3 9BE or if you would like to speak to us please call us on 01473 270707.

Please refer to the section “***Our Data Protection Officer***” below for further contact information.

Our Data Protection Officer

We have appointed a Data Protection Officer who oversees our handling of personal data and acts as our primary point of contact for any questions or concerns you may have regarding our handling of your personal data.

Our Data Protection Officer is Pete Smith. You can contact him in writing at John Grose Group Limited, Ransomes Europark, Ipswich, Suffolk, IP3 9BE or by email at petesmith@johngrose.co.uk.

What personal data we collect about you

We collect:

- **personal data that you provide to us.** There are lots of ways in which you may share your personal data with us, for example, register on our website, post on social media sites that we run, live chat with us on our website, contact us in connection with goods or services that you would like to buy, or have already bought from us, or visit us. You may also contact us to enquire or apply for a job opportunity.

The personal data that you provide to us may include your name, address, date of birth, e-mail address and phone number(s), vehicle information (i.e. registration number or number plate and vehicle identification number or VIN), driver's licence number and your financial and credit card information. If you contact us on behalf of your employer, the information you may provide includes your job title, employer name, work telephone number, address and email address. In addition, when we call you or you call us, we may record our conversations. CCTV also operates at our premises and therefore if you visit our premises your image may be captured on our CCTV recordings. If you contact us in relation to a job opportunity, the personal data you provide to us will include your job title, employer, details about your qualifications and work experience, and any other details you provide in support of your application.

- **personal data that we receive from third parties.** If we work with other businesses or use sub-contractors, these parties may collect personal data about you which they will share with us. For example, we may receive details of your credit history from credit reference agencies, have your name and contact details passed to us by a vehicle manufacturer that refers you to us so that we can provide you with our goods or services, receive feedback from a sub-contractor we have instructed (such as a vehicle accessory agent) to help us provide you with goods or services that you have requested.
- **personal data about your use of our website (including our live chat facility).** This is technical information and includes details such as your IP address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, as well as details of how you navigated to our website and where you went when you left, what pages or products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and any phone number used to call our customer service number.

What we use your personal data for

We use your personal data in the following ways:

- **personal data that you provide to us** is used to:
 - provide you with the information, products and services that you request from us;
 - provide you with marketing information in accordance with your marketing preferences (see “**How we use your personal data for marketing**” below);
 - manage and administer our business;
 - review and improve our goods and services;
 - help us identify you when you call us;
 - help us detect and prevent fraud, theft and money laundering;
 - recover debts;
 - carry out customer profiling (see “**Automated decision making and profiling**”.)
- Telephone call recordings are used for training purposes and for dealing with any complaints made by you;
- CCTV is used as one of the security measures at our premises to keep our staff, customers, goods, equipment and premises safe. It may also be used in legal proceedings;
- If you are applying for a job with us, we will use your personal data to assess your suitability for the role and to contact you in relation to your application.

- **personal data that we receive from third parties** is combined with the personal data that you provide to us and used for the purposes described above.

- **personal data about your use of our website** is used to:
 - administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our website to ensure that content is presented in the most effective manner for you and for your computer or mobile device;
 - 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 website safe and secure;
 - to measure or understand the effectiveness of advertising sent to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies please see our Cookie Policy on our website <https://www.johngrose.co.uk/exclusive/cookies/53659> for the use and the purposes for which we use them.

Consent and other legal grounds for processing your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

- we are entering into and carrying out our obligations under a contract with you;
- we need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights; and
- we are subject to legal obligations that require us to use your personal data in certain ways (such as disclosing information to HM Revenue & Customs).

In exceptional circumstances we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it at a later date.

The most common situation in which we will process your personal data on the grounds of consent is where we wish to send marketing communications to you. Please refer to the section on “**How we use your personal data for marketing**” below to read about our marketing practices.

To help you understand the legal grounds we rely on for different types of processing, we have set out an overview of the main processing activities we undertake and the relevant legal grounds below:

Categories of personal data used	Purpose	Legal Basis
Name, contact details and where relevant, employer and job title.	To respond to your enquiries regarding our goods and services.	Legitimate interest (in growing our business and developing new customer relationships) and/or contractual necessity.
Name, date of birth, contact details, vehicle information, driver's licence number, financial information, transaction history and where relevant job title and employer.	To provide you with the goods and services you wish to buy from us and to collect money owed to us.	Contractual necessity and/or legitimate interests (to recover monies due to us).

Categories of personal data used	Purpose	Legal Basis
Name and contact details, financial information, transaction history.	To manage our relationship with you e.g. to keep your details up to date and notify you of any changes to our contractual documents or privacy policies.	Contractual necessity and/or legitimate interests (to keep our records updated and understand how our customers use our goods and services).
Name and contact details, transaction history, details of your interests and preferences, technical data about your use of our website, your marketing preferences.	To send you appropriate marketing communications in accordance with your marketing preferences.	Consent and/or legitimate interests (to grow and develop our business).
Name and contact details, transaction history, technical data about your use of our website.	To manage and administer our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Legitimate interests (to run our business, provide administration and IT services, ensure network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercises) and legal obligations.
Name and contact details, transaction history, details of your interests and preferences, technical data about your use of our website, your marketing preferences.	To develop and improve our website, products/services, and our customer relationships and experience.	Legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business, to improve our products and services and to inform our marketing strategy).
CCTV images	To keep our staff, customers, goods, equipment and premises safe.	Legitimate interests – for security reasons.
Job title, name, contact details, employer, qualifications and work experience.	To assess your suitability for a role within our organisation.	Legitimate interest (to run and grow our business).

Personal data you are legally obliged to provide

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data, we may be unable to provide our goods or services to you.

Your rights to know what personal data we hold and to control how we use it

Unless otherwise provided by law:

- you have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right (or any of the other rights described below) by sending us a written request at any time. Please mark your communication **“Data Subject Request”** and send it to us by using the details above in the **“Who we are and how you can contact us”** section.

- you also have rights to:
 - prevent your personal data being used for marketing purposes (see **“How we use your personal data for marketing”** below for further details);
 - have inaccurate personal data corrected, blocked or erased;
 - object to decisions being made about you by automated means or to your personal data being used for profiling purposes;
 - restrict our use of your personal data;
 - require that we delete your personal data (the “right to be forgotten”);
 - withdraw your consent where we are relying on your consent to process your personal data. You can do this at any time (see **“consent and other legal grounds for processing your personal data”** above);
 - require that we provide you, or anyone that you nominate, with a copy of personal data you have given us in a structured electronic form such as a CSV file.

You can find full details of your personal data rights on the Information Commissioner’s Office website at www.ico.org.uk.

Automated decision making and profiling

We undertake automated decision making for the following purposes:

- Consumer Credit Applications

We use profiling to assist us in determining whether we can provide you with credit facilities. The automated decisions that we make may affect you in establishing both the suitability and affordability of any credit facilities that you may require.

You are entitled to ask that we do not make automated decisions about you or use your personal data for profiling purposes. Please refer to the section on **“Your rights to know what personal data we hold and to control how we use it”** above for details on how to exercise your rights.

When we will share your personal data with others

We share your data with business partners in the day to day running our business:

- other companies that are part of the John Grose group;
- the business partners, suppliers and sub-contractors we work with to provide you with goods or services that you have requested from us;
- vehicle and components parts manufacturers;
- advertisers and advertising networks (see “**How we use your personal data for marketing**” for more information);
- analytics and search engine providers that assist us in the improvement and optimisation of our websites;
- website developers and hosts acting as processors who developed, host and maintain our website(s);
- professional advisers acting as processors, joint controllers or controllers including lawyers, bankers, auditors and insurers, who provide consultancy, banking, legal, insurance and accounting services;
- HM Revenue & Customs, regulators and other authorities acting as processors, joint controllers or controllers based in the UK who require reporting of processing activities in certain circumstances;
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you. We are authorised and regulated by the Financial Conduct Authority (“**FCA**”); reference number 311058. You can check this on the FCA’s website www.FCA.org.uk/register or by contacting the FCA on 0300 5008082. John Grose Group Ltd is a credit broker but not a lender. In the event a financial services complaint cannot be settled between us, you may refer to the Financial Ombudsman Service. This service is free to use. Their contact details are Financial Ombudsman Service, Exchange Tower, London E14 9SR; telephone 0800 0234567 or 0300 1239123; email complaint.info@financial-ombudsman.org.uk; and their website is www.financial-ombudsman.org.uk. In the event a non-financial services complaint cannot be settled between us, we recommend the National Conciliation Service as an organisation competent to deal with unresolved complaints. Their contact details are National Conciliation Service, 2 Allerton Road, Central Park, Rugby, CV23 0PA; telephone 01788 538317; email contact@nationalconciliationservice.co.uk.

We may also share your personal information with third parties on a one-off basis, for example, if:

- we sell or buy any business or assets (including our own), in which case we will disclose your personal data to the prospective seller or buyer of such business or assets; or
- we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms of use <https://www.johngrose.co.uk/pages/terms> and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

How we keep your personal data safe

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- storing your personal data on secure servers;
- ensuring that our staff receive regular data security awareness training;
- keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises;
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems.

Please remember that you are responsible for keeping your passwords secure. If we have given you (or you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. Please do not to share your passwords with anyone.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

How we use your personal data for marketing

We will add your details to our marketing database if:

- you make an enquiry about our goods or services;
- you buy our goods or services;
- you have told a third party that you would like them to pass us your contact details so that we can send you updates about our goods and services;
- you have registered an account on our website and have indicated during the sign-up process that you are happy to receive marketing communications.

We may send you marketing communications by email, telephone, automated calls, text message and post. You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls), or you may ask us not to send you any marketing communications at all.

We may ask you to indicate your marketing preferences when you first register an account on our website. You can check and update your current marketing preferences at any time by calling us using the details set out in the **“Who we are and how you can contact us”** section above or by emailing us via dataprotection@johngrose.co.uk. You can also click unsubscribe on our email marketing communications.

We will only share your personal data with third parties for marketing purposes if you provide us with your consent by ticking the relevant box on a form we use to collect your personal data.

When we will send your personal data to other countries

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by us or by our sub-contractors. Where we, or our sub-contractors, use IT systems or software that is provided by non-UK companies, your personal data may be stored on the servers of these non-UK companies outside the EEA. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

How long we keep your personal data

We only keep your personal data for as long as we actually need it. In practice this means that we will keep your personal data for no longer than six years. Should you make a request to have your personal data deleted, where the law does not require us to retain your data, we will arrange for its deletion.

We may keep your data for longer than the above stated time periods where we are required to do so by law.

Please note that we may anonymise your personal data or use it for statistical and training purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

If you have any questions about our data retention practices, please contact us using the details in the "**Who we are and how you can contact us**" section above.

How you can make a complaint

If you are unhappy with the way we have used your personal data, please contact us to discuss this using the contact details set out in the "**Who we are and how to contact us**" section above.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting www.ico.org.uk. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures, or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website or you can contact us (see "**Who we are and how to contact us**" above) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown at the end of the policy and the date on which that version of the policy came into force.

This is policy version 2 which came into effect in September 2019.