

This website is operated by Hedin Automotive. We appreciate your interest in our products and services and your visit to this website.

Your privacy is important to us and we want you to feel comfortable with how we use and share your information. This policy sets out how Hedin Automotive and its associated companies handle your personal information, including why and how it is collected, how it is used and disclosed, how it is kept secure and for how long it is retained.

Who we are

Hedin Automotive ('we' or 'us') are a 'data controller' for the purposes of the relevant data protection legislation including the Data Protection Act 1998, the General Data Protection Regulations and any subsequent legislation as appropriate (i.e. we are responsible for, and control the processing of, your personal information).

What information do we collect?

Personal information provided by you

We collect the following personal information about you when you register with us, express an interest in or purchase products or services from us. We also collect personal information when you contact us, send us feedback, post material to our website, complete customer surveys or participate in competitions.

Personal information provided by third parties

Occasionally we may receive information about you from other sources (such as credit reference agencies, medical professionals, or your employer), which we will add to the information we already hold about you in order to help us provide products and services and/or improve and personalise our service to you. We will always seek your permission to contact these people for your information.

The information we collect may include:

- Basic personal details such as your name, address, e-mail address, telephone number, date of birth or age, gender, marital status;
- Additional information regarding your vehicle including the registration, VIN number, service history, any works undertaken, insurance policy details, MOT and Tax status of the vehicle;
- Sensitive personal information may be collected where a vehicle is purchased under the Motability scheme. This may include details of any medical conditions. We will always be clear to explain when and why we need this information and the purposes for which we will use it and will obtain your explicit consent to use sensitive personal information;

Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her personal data;
- receive on his/her behalf any data protection notices;
- give consent to the transfer of his/her personal data abroad; and
- give consent to the processing of his/her health information (e.g. for Motability) or whether they have committed a criminal offence (e.g. for a finance or an insurance product)

Sensitive personal information

We may ask you to provide sensitive personal information, for example where you require us to tailor our goods or services to an existing physical condition e.g. as part of the Motability scheme, or where you are applying for a finance or an insurance product and we are required to enquire whether you have committed a criminal offence. If we request such information, we will explain why we are requesting it and how we intend to use it.

Sensitive personal information includes information relating to:

- your ethnic origin;
- whether you belong to a trade union;
- your physical or mental health or condition; and
- whether you have committed a criminal offence

We will only collect your sensitive personal information with your explicit consent.

Monitoring and recording communications

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

Use of cookies

A cookie is a small text file which may be placed onto your computer (or other electronic device) when you use our website. We may use cookies and other similar tracking technologies such as web beacons, action tags, Local Shared Objects ('Flash cookies'), single-pixel gifs on our website.

For example, we may monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users.

Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

You can set your browser not to accept cookies and the websites below tells you how to remove cookies from your browser. However, some of our website features may not function as a result.

For further information on our use of cookies please contact our compliance manager by email compliance@stephenjames.co.uk.

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

How will we use the information about you?

We collect information about you so that we can:

- contact you following your enquiry to us and to arrange a test drive;
- identify you and manage any accounts you hold with us;
- process your order;
- maintain a service record for your vehicle, share information with warranty or aftersales to provide the right services to you;
- detect and prevent fraud;
- verify your identity and carry out anti-fraud checks (see 'Credit checking' section below),
- provide you with payment options,
- assess your application for a product, service or quote,
- ensure that you can afford any financial agreement offered,
- ensure that any insurance products are suitable for you,
- administer your finance agreements including updating you on and delivering our services,
- Provide third party breakdown services if required;
- Provide insurances via a third party as necessary;
- Contact you to advise if there are urgent safety or product recall notices or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you;
- carry out customer profiling and analyse your purchasing preferences;
- monitor your use of our Websites and any response to advertising campaigns;
- carry out customer profiling via your use of our websites, conduct research, statistical analysis, behavioural analysis and analyse your purchasing preferences;
- if you agree, let you know about other products or services that may be of interest to you - see 'Marketing' section below;
- meet our legal obligations to HMRC, DVLA or any other public authority as necessary

We may also offer enhanced services including MOT and service reminders where we believe this would be helpful or of interest.

Where your vehicle manufacturer maintains an electronic service record of your vehicle we may share details of any work with your manufacturer so that an accurate record can be kept.

Marketing

We would like to send you information by post, email, telephone, text message (SMS) or automated call about relevant product, services, competitions and special offers which may be of interest to you.

We will only ask whether you would like us to send you marketing messages when you approve by ticking the relevant box(es) when you complete relevant online forms, agree over the phone or in person or in written communication.

If you have consented to receive such marketing from us you can opt out at any time. See 'What rights do you have?' below for further information.

You can also manage your preferences by contacting our compliance manager via email compliance@stephenjames.co.uk

Credit checking

We may do a credit check on you:

- so that we can make credit decisions about you and members of your household, and
- to prevent and detect fraud and money laundering

Our search will be recorded on the files of the credit reference agency.

We may also disclose information about how you conduct your account to credit reference agencies and your information may be linked to records relating to other people living at the same address with whom you are financially linked.

Other credit businesses may use your information to:

- make credit decisions about you and the people with whom you are financially associated;
- trace debtors, and
- prevent and detect fraud and money laundering.

If you provide false or inaccurate information to us and we suspect fraud, we will record this.

If you want to see your credit file, please contact the credit reference agency which we use:

Dun & Bradstreet Ltd
Marlow International
Parkway
Marlow
Bucks
SL71AJ

Who your information might be shared with

We may disclose your personal data to:

- other companies within our group;
- our agents and service providers;
- credit reference agents-see 'Credit checking' above;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- our business partners in accordance with the 'Marketing and opting out' section above; and
- your car manufacturer

Where we disclose your information to our third-party service providers, we only disclose personal information that is necessary for them to provide their service and they are obliged to keep your information secure and not use it other than in accordance with our specific instructions.

When you enquire about, or purchase, our products or services we may provide details of the vehicle to the manufacturer. This is in accordance with our manufacturer franchise agreement and is transmitted over a secure connection to their servers.

When you purchase a new vehicle from us, we are obliged to submit some of the personal information to the Driver and Vehicle Licensing Agency (DVLA) in order to register that vehicle.

When you service your vehicle with us we submit some of the personal information to the relevant government agencies to ensure your vehicle's data is maintained.

If you do not wish for the above obligatory transfers to take place, you must advise this at the point of providing the data. Please note that this may prevent us from being able to provide the goods or services requested. Where this is the case you will be given the option of how you wish to proceed.

Keeping your data secure

We use reasonable technical and organisational measures to safeguard your personal data, for example:

- access to your personal data is controlled
- we store your personal data on secure servers; and

- payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see 'How can you contact us?' below).

What can I do to keep my information safe?

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Transfers of your information out of the EEA

We may need to transfer your personal data to the United States of America which is located outside the European Economic Area, where your information may be stored with one of our software providers. Any transfer of your data will be subject to a European Commission approved contract that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

We do not retain personal information in an identifiable format for longer than is necessary. We may need your personal information to establish, bring or defend legal claims, in which case we will retain your personal information for seven years after the last occasion on which we used your personal information as specified above. The only exceptions to this are where the law requires us to hold your personal information for a longer or shorter period of time or you exercise your rights as detailed below.

As a Data Subject, what rights do you have?

Right to request a copy of your information

You can request a copy of your information which we hold (this is known as a data subject access request). If you would like a copy of some or all of it, please:

- email, call or write to us (see 'How can you contact us?' below) or fill in the following form <http://tinyurl.com/sj-dsar> ;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information you want a copy of, including any account or reference numbers, if you have them

Right to correct any mistakes in your information

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below);
- let us have enough information to identify you (e.g. account number, user name, registration details), and
- let us know the information that is incorrect and what it should be replaced with.

Right to ask us to stop contacting you with direct marketing

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below). You may also click on the 'unsubscribe' option in email communications. It may take up to 10 business days for this to take place.
- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

We may also ask for proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill)

Right to restrict processing and to be forgotten

Where your details are no longer needed to perform our contractual obligations, you have the right to restrict how we use your data, including to request that we delete any or all personal data we hold on you. The only reason we would not carry out this request is if it would result in us being in breach of other legal or regulatory obligations we have. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below). You can also click on the 'unsubscribe' option in email communications. All other updates will take place within 10 business days. You may also use the following form <http://tinyurl.com/sj-dsrr>
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

Please note that in relations to certain rights, we may need to verify your identity to ensure we amend/delete the correct individual's personal information. We will respond to you within 30 days after we have received this information, or where no such information is required, after we have received your request.

Right to transfer your data

Where data is processed automatically you have the right to request that we provide a copy of the data in a commonly read format to another controller. The only reason we would not carry out this request is if it would result in us being in breach of other legal or regulatory obligations we have,

If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below). You can also click on the 'unsubscribe' option in email communication. All other updates will take place within 10 business days.
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

How to contact us

Please contact our Compliance Manager, if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to compliance@stephenjames.co.uk or write to us at Unit 1, Martinsbridge Estate, Enfield, Middlesex, EN1 1SP or call us on 02084438443.

Right to complain to the UK Data Protection Regulator

You have the right to complain to the Information Commissioner's Office (ico) if you are concerned about the way Hedin Automotive or its associated companies have processed your personal information. Please visit the ico's website for further details.

Changes to the privacy policy

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access our website. This policy was last updated in May 2018.