

DONNELLY GROUP PRIVACY POLICY

The Donnelly Group is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website you can be assured that it will only be used in accordance with this privacy policy.

This privacy policy sets out how the Donnelly Group uses and protects any information that you give Donnelly Group when you use this website or otherwise interact with us through any channel including over the phone, in our showrooms, through our customer services, servicing departments, social media or otherwise.

Donnelly Group may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. If we propose a significant change we will notify you by email and will otherwise post an alert that our policy has changed on our website.

When, in this policy, we refer to Donnelly Group, we mean the Donnelly Group companies to include:

- Donnelly Bros Garages (Dungannon) Limited whose registered address is at 59 Moy Road, Dungannon, BT71 7DT and which is registered under company number NI00643;
- Donnelly & Taggart (Ballymena) Limited whose trading address is at 120 Antrim Road, Ballymena, BT42 2HD and which is registered under company number NI047741;
- Donnelly Bros (Honda) Limited whose trading address is at 8 Boucher Road, Belfast, BT12 6HR and which is registered under company number NI070608;
- Donnelly Motorstore Limited whose trading address is at 181 Ballygawley Road, Dungannon, BT70 1RX and which is registered under company number NI064586;
- Donnelly & Taggart Limited whose trading address is at Campsie Industrial Estate, Eglinton, BT47 3DN and which is registered under company number NI 025804;
- Donnelly Finance & Leasing Ltd, trading as Donnelly Fleet whose trading address is at 45 Mallusk Road, Newtownabbey, BT36 4PS and which is registered under company number NI41870;
- Donnelly Bros Garages (Fermanagh) Limited whose trading address is at 101 Irvinestown Road, Enniskillen, BT74 6DN and which is registered under company number NI 41868;
- Donnelly Bros (Belfast) Limited whose trading address is at Mallusk Way, Mallusk Road, Newtownabbey, BT36 4AA and which is registered under company number NI32024.
- Donnelly Bros Bangor Limited whose trading address is at 3 Green Road, Bangor, BT23 7PZ and which is registered under company number NI654441.

The Donnelly Group is responsible for ensuring that the personal data we collect is processed in accordance with relevant data protection laws.

Donnelly Group is registered with the Information Commissioner's Office ("ICO") under number Z1445778.

Registration Link <https://ico.org.uk/ESDWebPages/Entry/Z1445778>.

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WHAT INFORMATION WE COLLECT ABOUT YOU

We may collect the following information:

- Name;
- Contact information including email address & telephone number;
- Geographic information such as address and postcode;
- Vehicle information such as registration number;
- Other information relevant to customer surveys and/or offers;
- Any other information relevant to your enquiry which you choose to provide.
- Your bank details or credit/debit card details;
- Your contact preferences;
- Information about the vehicles, products and or services that you are interested in;
- Information about your circumstances including information about any existing vehicles owned, requirements for a new vehicle and how the vehicle would be funded;
- Information about how you navigate and use our website which can be viewed in our Cookie Policy; and
- Call recordings and images taken from CCTV systems that are used on our premises.

Our website

Our website is powered by G-Forces Web Management Limited ("GForces"), our third party web services provider. GForces is committed to ensuring that data is processed in accordance with applicable data privacy laws, and is kept secure. GForces is certified to the standard of ISO27001 (an international standard for information security). GForces uses Amazon Web Services, Inc. as its cloud platform provider. All data processed by GForces is stored on Amazon's web servers in the EEA.

If you use our enquiry forms

When you submit information using an online form, GForces processes the data collected and stores it for 31 days for the legitimate business purpose of enabling us to access the information and deal with your request (it is then kept for a further 14 days in GForces' routine back-ups for business continuity purposes). We collect the following information; title, first name, last name, email address, telephone number, your preferred Donnelly Group location, and enquiry details. If you enter your post code, GForces stores the first part of it (e.g. 'ME14' or 'SW1') and links it to standard internet log information already collected which can be viewed in our Cookie Policy.

WHAT WE DO WITH THE INFORMATION WE GATHER

We only use the personal information that you supply to us for the following purposes;

- To respond to and fulfil a request you make to us through this website or otherwise,
 - e.g. for a brochure, to request a test drive, a vehicle valuation, to book a service or to provide you with information requested about our range of products and services.
- To contact you with information about other Donnelly Group products and services if you wish for us to do so. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted.
- To contact you if we experience problems in fulfilling one of your requests in a timely manner;
- To fulfil our contractual obligations to you by providing the products and services you request from us.
- To resolve any complaints;
- To process payments and if necessary, collect payment arrears;
- To monitor, assess and improve the level of customer service we provide;
- To repair and improve this website or ensure that the content on our website is presented in the most effective manner;
- As part of our efforts to keep this website safe and secure;
- To personalise our interactions with you;
 - See our Cookie Policy to find out more.
- To detect or prevent unlawful, malicious or offensive activity;
- To contact you about safety or quality issues relating to your vehicle;
- To remind you about important service or MOT deadlines; and
- To comply with an order of a Court of Law of competent jurisdiction.

What legal basis do we rely on to process your information?

Data protection law sets out a number of conditions which organisations can rely on in order to lawfully handle personal information. The conditions we rely on are as follows: -

Legitimate interests

The law permits us to handle your personal information where necessary in our legitimate interests provided that this isn't outweighed by your interests. Many of the purposes we handle your personal information, described above, fall into this category as they are essential activities which enable us to run our business efficiently and effectively for example, enabling us to use third party service providers and to monitor, review and improve the services we provide to you and your experience when you visit our website.

We also rely on the legitimate interests basis for processing to contact you to remind you about important safety and quality issues relating to your vehicle including to remind you about service and MOT due dates. This is important to help ensure that you comply with legal requirements and also maintain the quality of your vehicle. If you would prefer that we didn't remind you of these dates, you can let us know anytime by contacting our Data Protection Officer on the details below.

We also rely on this processing ground to help us ensure that we communicate with you about products and services, that you are most likely to be interested in, and in the way that you are most likely to want to communicate with us. We may, if necessary, also use your

information to defend our legal rights, to obtain legal advice, to monitor our premises and to manage any complaint that you might have. We ensure that your rights and interests are protected when we do this.

Consent

You have a choice about how you receive our marketing information. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted. You can change your contact preferences on the main website or by contacting dataprotection.officer@donnellygroup.co.uk

We will gather your consent by communicating the following statement to you in person or over the phone as part of our interaction with you. You will have the option to respond with a Yes or No answer to each;

“Donnelly Group would like to contact you by email, phone, post and sms to keep you informed about vehicle servicing, product renewals, our news, offers and events that we think may be of interest to you.

Would you like to hear from us by:

Email

Phone

Post

SMS”

Performance of a contract

Where you transact with us to buy vehicles or parts or to book a service or MOT, we will use your personal information so that we can fulfil our part of the contract e.g. to deliver the product to you, to take payment and to manage your order. Where we need personal data to perform our contract, if you do not provide it, we will not be able to provide the services to you.

Required by law

We will, if required by law, disclose your personal information for example in response to a Court Order. We will disclose your personal information if requested by a law enforcement agency or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, non-compliance with of our Terms and conditions, or as otherwise permitted or required by law and consistent with legal requirements.

WHO WE SHARE YOUR INFORMATION WITH

Manufacturers

In order to process vehicle sales, replacement parts and accessory sales, servicing, warranty claims and to record vehicle history, we will share your personal information with vehicle manufacturers. We will also share it with them for reporting purposes. The vehicle manufacturers we work with are listed below. You can see how they will process your personal information by clicking on the link to their privacy policy.

Toyota <https://www.toyota.co.uk/>

Service providers

As part of offering services to you we will share your personal information with third party partners of Donnelly Group who provide services to us to help us run our business effectively. These include:-

- Couriers who help us deliver the products you order;
- IT service providers who help us manage our IT infrastructure;
- Finance companies where you want to obtain finance to facilitate your purchase;
- Debt collection agencies should there be an outstanding debt;
- Marketing agencies who work with us and our manufacturer partners to keep you informed;
- Aftercare services such as our warranty partners;
- Solicitors and Accident Repair Centres in response to our Accident Management solution; and
- Social media companies who help us interact with you better.

Donnelly Group Companies

Where you require additional services in line with the offerings of our subsidiary companies, we will share the information you provide to us with them. These companies include;

- Donnelly Fleet –the Donnelly Group business and personal leasing company;
- TBC Conversions – Taxi & Bus Conversions for all Motability adaptations, taxi and bus and specialist conversions.

Police and law enforcement agencies

Where required by law, we will share your personal information with the police and other law enforcement agencies.

We will always limit the personal information we share to that which is necessary to enable them to perform their services. We will also always ensure that before we share your personal information, we have entered into a contract with the service provider which requires them to keep your information secure and only use it for the purposes we permit them to. We will never sell or share your personal information with third parties for the purposes of marketing without seeking prior consent.

Where in the world will we hold your information?

To help us provide you with information relating to products and services that we think you will be interested in your data may occasionally be processed and held by third parties outside the European Economic Area (EEA).

Whereas in the EU, we implement a high standard of data protection law, some parts of the world do not implement such stringent laws. As a result, if we do send personal information overseas we will make sure that appropriate safeguards are in place to ensure it is protected in accordance with European data protection law. These might include: -

- Sending personal information only to countries that European Authorities have indicated have adequate data protection laws in place e.g. Canada or Switzerland;
- Putting in place contracts with the recipient containing terms which the European Authorities have approved as providing adequate protection; organisations which are members of a scheme which has been approved by European Authorities as achieving adequate protection e.g. Privacy Shield.

Security

We are committed to ensuring that your information is secure. 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 hold about you.

HOW LONG WE WILL KEEP YOUR PERSONAL INFORMATION FOR

We will keep your personal information for as long as we need it to provide the services and products you request from us. We may also keep it to comply with our legal obligations, to resolve complaints and to enforce our rights. As a result, the length of time that we keep your information for will vary depending on the purposes for which we have it. In any event, we will review what information we need on an ongoing basis and will only retain it for the minimum amount of time that we need it.

Your rights

You have a right to access and receive a copy of all personal information we hold about you. You can exercise this right by contacting us at dataprotection.officer@donnellygroup.co.uk.

New data protection laws also mean that you have a number of additional rights including the right to have your personal information erased, the right to have your personal information transferred either to you or a third party in a commonly structured format and to have your personal information restricted. Please be aware that these latter rights only apply in limited circumstances and therefore even if you do wish to exercise them, we may not always be required to comply.

Where processing is based on consent, you can withdraw your consent at anytime. By way of example, you have the right to request that we don't send marketing material to you. You can also correct or amend your personal information.

To do this you can contact us at our Head Office on 028 8772 2887 or by visiting Data Preferences. You can also opt out of receiving marketing material at any time by ticking the unsubscribe option in any communication we send you.

Website Data Preferences Centre

Under data privacy laws, you have the rights to:

- request access to your personal data;
- object to your personal data being processed and/or to have it restricted;
- request deletion or correction of your personal data; and
- request that your personal data be transferred to another person.

Our online data preference centre helps you to exercise the rights that data privacy laws give you and control your personal information.

It contains five separate forms, as set out below.

- See your data

You can ask to see any personal information that we hold (known as a “subject access request”) by submitting the form on the “See your data” tab. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

- Transfer your data

By completing the form on the “transfer your data” tab, you can ask us to provide your data to a third party.

- Delete your data

You can ask us to delete the information we hold about you by completing the form on the “delete your data” tab.

- Change your data

If we do hold information about you, you can also ask us to correct any mistakes by completing the form on the “Change your data” tab.

- Marketing Preferences

On the “marketing preferences” tab, you can tell us how you would like us to send you marketing information, or ask us to stop marketing to you entirely.

HOW YOU CAN CONTACT US

The Donnelly Group is happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to request information about our privacy policy, make requests concerning your data or make a complaint, you can contact:

FAO Data Protection Officer
Donnelly Group Head Office

59 Moy Road

Dungannon
BT71 7DT

Tel: 028 8772 2887

Email: dataprotection.officer@donnellygroup.co.uk

Web: www.donnellygroup.co.uk

YOUR RIGHT TO COMPLAIN

If you are unhappy about how the Donnelly Group have used your personal information, you have a right to complain to the Information Commissioner's Office. You can do this by contacting:

Information Commissioner's Office

Third Floor

14 Cromac Place

Belfast

BT7 2JB

Tel: 028 9027 8757

Web: www.ico.org.uk