

The logo for Howards Motor Group features a blue outline of a roof above the word "Howards" in a large, bold, black sans-serif font. To the right of "Howards" is the text "Motor Group" in a smaller, bold, black sans-serif font.

Howards Motor Group

PRIVACY STATEMENT

At Howards Motor Group we take your privacy very seriously and we are committed to protecting and respecting any personal information you share with us.

This statement describes what types of information we collect from you, how it is used, how we share it with others, how you can manage the information we hold and how you can contact us.

We will always give you the opportunity not to receive marketing communications from us. We will never send you 'junk' emails or communications, or pass your data onto to a third party who might. We work with specialised partners who help us provide some services to you, we will always tell you who they are and ensure they only have access to information they need to fulfil that service and ensure they comply with current data protection legislation.

Howards may contact you via email to invite you to review any services and/or products you received from us [in order to collect your feedback and improve our services [and products]] (the "purpose"). We use an external company, Trustpilot A/S ("Trustpilot"), to collect your feedback which means that we will share your name, email address and reference number with Trustpilot for the purpose. If you want to read more about how Trustpilot process your data, you can find their privacy policy here - uk.legal.trustpilot.com/end-user-privacy-terms.

Howards may also use such reviews in other promotional material and media for our advertising and promotional purposes.

WHAT INFORMATION 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.

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;
- Driving licence details;
- 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;
- Your IP address, the internet browser and device you are using, cookie or pixel information (please see our Cookie Policy for more details);
- Where you engage with us to conduct a sales transaction, we additionally may collect bank account details, debit/credit card details and any information required by our finance partners to complete a finance application. For example time at present address and/or employer details;
- Voice recordings of calls into our business or calls we make to you may be recorded for quality and training purposes;
- If you visit one of our premises you may be recorded on CCTV.

How will we use the information about you?

We collect information about you so that we can:

- Identify you and manage any accounts you hold with us;
- Process your order;
- Maintain a service record for your vehicle, conduct research, statistical analysis and behavioural analysis;
- Carry out customer profiling and analyse your purchasing preferences;
- Let you know about other products, services or events that may be of interest to you;
- Detect and prevent fraud;
- Send MOT and Service reminders;
- 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 any finance agreements including updating you on and delivering our services;
- Monitor your use of our Websites and any response to advertising campaigns.

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.

There are various ways in which we may use or process your personal information. We list these below:

Consent:

Where you have provided your consent, we may use and process your information to:

- Contact you from time to time about promotions, events, products, services or information which we think may be of interest to you

You can withdraw your consent at any time by contacting us at using the email address customercare@howardsgroup.co.uk, visiting our website www.howardsgroup.co.uk/marketing-updates, writing to the address listed in the 'How to contact us' section, or by using the unsubscribe option included in any of our email marketing messages.

Contractual performance

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us (or one of our authorised dealers or selected partners).

Legitimate Interests

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support customers with sales and other enquiries

- To respond to correspondence you send to us and fulfil the requests you make to us (for example: test drives, service requests, brochure requests or information about specific vehicles)
- To provide vehicle support and services (for example warranty services)

Processing necessary for us to understand customer requirements

- To analyse, evaluate and improve our products and services so that your visit and use of our website, applications and dealerships are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally).
- To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services that we think you will be interested in.
- We collect and analyse this information in this way so that we can deliver the most appropriate customer experience to you by tailoring and making relevant all our service and communications (for example, when your mileage suggests your vehicle is due for a service).

Processing necessary for us to promote our business, brands and products

- To send/contact you with marketing information after you have purchased a product or service from us or made a purchasing enquiry, We will only contact you with information about our own products and services (and in ways the law allows). You have the right to object to us sending you this information at any time.
- To send MOT and/or Service reminders and contact you to arrange an appointment.
- To contact you from time to time with marketing information (unless you object) if you have expressly indicated to us that you are acting on behalf of a business or where we have obtained your business contact details from our authorised dealer network or an online or public business directory. In relation to any such information we send by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing.
- To contact you with targeted advertising delivered online through social media and other platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us.
- To identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information). To administer competitions and promotions that you enter with us from time to time and to distribute prizes.
- To send you invitations (unless you object) to provide a review regarding your customer experience when you have purchased a car from us or visited one of our service departments.

Legal Obligation

We may process your personal information to comply with our legal requirements (for example to register your car with the DVLA).

Vital Interest

Sometimes we will need to process your personal information to contact you if there is an urgent safety or product recall notice and we need to tell you about it.

How do we share this information?

We do not sell your information to third parties, but we do work closely with our manufacturer partners and with third party suppliers who fulfil business activities for us (like warranty products, marketing, events and market research etc).

We do not sell your information to third parties. However, we may from time to time disclose your information to the following categories of companies or organisations to which we pass the responsibility to handle services on our behalf: warranty providers, customer contact centres, mobility and car hire providers, direct marketing communications agencies and consultants, market research and market analytics service providers, our legal and other professional advisors.

We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated non specific data sets where ever possible.

Whilst our business is UK based there may be some instances where your information is processed or stored outside of the EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

How long do we keep your information for?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

We do not retain personal information in an identifiable format for longer than is necessary.

If we have a trading relationship with you (e.g. you are a customer or the registered driver of a leased or other vehicle purchased from us), we hold your personal information for 6 years from the date our relationship ends. We hold your personal information for this period to establish, bring or defend legal claims. Our relationship may end for a number of reasons including where the vehicle warranty or lease expires, or we have been made aware that you no longer own or drive that vehicle.

Where we have obtained your personal information following a request for information, test drive, brochure, quotation or any other information on any of our products or services, we hold your personal information for 1 year and 6 months from the date we collect that information, unless during that period we form a relationship with you e.g. you purchase or lease a vehicle. We hold your personal information for this period to give us an opportunity to form a relationship with you.

The only exceptions to the periods mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- Where you have raised a complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further How can I manage the information we hold about you)

How can you manage the information we hold about you?

You have the right as an individual to access your personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request (including any identification documents requested).

You have the right to:

- Ask for a copy of the information that we hold about you
- Correct and update your information
- Withdraw your consent (where we rely on it). Please see the section above called 'how we use your personal information'
- Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
- Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information
- Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

You can exercise the above rights and/or manage your information by contacting us at customercare@howardsgroup.co.uk by using our website www.howardsgroup.co.uk/marketing-updates, phoning us on 01935 678140 or by writing to us at the address in the 'How to contact us' section.

COOKIE POLICY

This explains what cookies are and how they are used across our websites. It will also tell you how to manage and remove them if you choose to.

What are cookies?

Cookies are small files that are sent from our website to your computer or mobile phone to improve your user experience. They do this by remembering you and your personal preferences, such as your location.

We can only read cookies that are served from our website and will never share this information with any third parties.

How do we use cookies?

We use cookies in a number of different ways:

1) Anonymous Analytical Cookies

The analytical cookies that we use store anonymous information about which pages people visit, how long they are on the site, how they got there and what they click on. Information supplied by these cookies help us to analyse the profile of our visitors, make sure our websites are meeting your needs and how we could provide you with an improved experience. Anonymous analytical cookies do not collect or store your personal information (for example, names or addresses), so this information cannot be used to identify you.

2) Customer Feedback Questionnaires

We value your opinion so from time to time we ask for feedback on our websites via online surveys. Cookies will be used here to make sure that you don't get repeat invitations to take part.

3) Third Party Cookies

Most of the Howards Motor Group advertising that you see on other websites is put there by third parties. Anonymous cookies are used in these instances to track how many and how often people see a particular ad. Any information found by these cookies may be used to target ads to you on other websites. Since these ads are not on Howards Motor Group websites, we are unable to read or write the cookies used.

How to manage cookies

If your browser preferences allow it, most websites will send cookies to your computer or mobile phone. However, you can change these settings. How you do this varies with each browser, though more often than not it will be through the 'Options' or 'Preferences' tab.

For the best possible experience of **Howards Motor Group** online, we strongly recommend you leave cookies on.

Cookies used by Howards Motor Group and by Third Parties

Cookie from	Cookie name	Description of cookies
Media	1 cookies from Facebook 3 cookies from BING 2 cookies from Google Adwords	This Third Party tracking allows our media owners to better understand user profiles and enables them and us to tailor our adverts to make them more relevant to our customers' needs.
AutoTrader	TS01a627eb	Allows us to provide an accurate valuation for your car when using some of our features on the Howards Motor Group website.
HotJar & VWO		This helps our web team to improve the user journey on howardsgroup.co.uk. We monitor how you use the website, this doesn't include any information that is personal to you.

What do I do now?

In order to enjoy the best possible experience of <https://www.howardsgroup.co.uk/> we recommend that you leave your cookies settings as they are.

How can you change your cookie settings?

Users can control cookies via their browser settings. Please visit these links to find out more

<https://www.aboutcookies.org/>

<http://www.allaboutcookies.org/>

To opt-out of being tracked by Google Analytics please visit this page

<https://tools.google.com/dlpage/gaoptout>

Credit Checking

We may perform a credit check on you:

- so that we and other companies in our group 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.

WHO YOUR INFORMATION MIGHT BE SHARED WITH

We may disclose your personal data to:

- other dealerships within our group
- our agents and service providers;
- credit reference agents—see 'Credit checking' below;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- our business partners
- our Manufacturers
- government agencies (for the purpose of checking driving licence details for loan and demonstration vehicle purposes)

Any documents which arrive with a vehicle when it is taken into stock may be retained by us, shown to any potential buyers and handed to any new owner to ensure the provenance of the vehicle in order to maintain the vehicle's value, prevent fraud and ensure vehicle safety.

KEEPING YOUR DATA SECURE

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

- we store your personal data on secure servers; and

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 to contact us?').

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.

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 subject access request). If you would like a copy of some or it, please:

- email, call or write to us (see 'How to contact us?');
- 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 or use the notification section on our website (see 'How to contact us?');
- let us have enough information to identify you (e.g. 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 to contact us?'). You can also click on the 'unsubscribe' button at the bottom of any emails. It may take up to 5 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).

CHANGES TO THE PRIVACY STATEMENT

We may change this privacy statement from time to time. You should check this statement occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

DO YOU NEED EXTRA HELP?

If you would like this statement in another format (for example: audio, large print, braille) please contact us (see 'How to contact us?').

HOW TO CONTACT US

If you need any further information regarding this Privacy Statement or data protection please contact Paul Hancock on 01823 273415 or email paul.hancock@howardsgroup.co.uk,

alternatively you can write to us at:

FAO: Paul Hancock
Customer Care Department
Howards Motor Group
Lufton Way
Houndstone Business Park
Yeovil
BA22 8PT

For Marketing updates please email customercare@howardsgroup.co.uk
or login onto our website to request an amendment on
www.howardsgroup.co.uk/marketing-updates, or phone us on 01935 678140.