



Progress Motor Group Ltd Privacy Statement

We reserve the right to update this Privacy Statement from time to time by publishing the amended version on this page. *This version was published on 27/10/2021.*

Introduction

The following Privacy Statement relates to Progress Motor Group Ltd. It applies to how we use and store personal information we hold about individuals. It does not apply to information we hold about companies or other organisations. A separate privacy statement is available for our employees. We take the privacy of your personal information very seriously and will only use your personal information in accordance with this Privacy Statement and the current data protection law in the UK.

Collecting Personal Information

We may collect information about you in the ways listed below:

- When you visit our website
- When you contact us directly, either through our website, by email, by telephone, by visiting one of our dealerships or at an off-site promotion
- When you purchase a product or service from our dealership
- From your vehicle's manufacturer
- From your vehicle's insurer
- Through other third parties to whom you have provided consent to pass your information to us
- If you apply for a position of employment with us

We may collect, store, and use the following kinds of personal information. The types of information we collect from individuals will vary depending on the reasons for its collection and the individual's relationship with us:

- Your contact details (including name, address, telephone numbers and email address)
- Date of birth
- Driving licence information
- National insurance number
- Employment information
- Bank and/or payment details
- Confirmation of entitlement to benefits (for Disabled Vehicle Tax, etc)
- Your digital footprint, including:
 - Unique device identifier
 - IP address
 - A persistent identifier (e.g., a unique customer number in a Cookie)
 - Geo-tracking data, including location-based services
 - Application/Website Usage, Device/Operating System/Browser Information, and/or Customer Behaviour (Application Logs)
- Your vehicle's identification numbers, registration dates & Make/Model

Using Personal Information

We will only use the personal information provided where we have a legal basis to do so, including:

- To provide or manage any information, products, or services you have asked for
- To enable us provide access to the services offered on our website
- To send invoices, statements, and payment reminders to you, collect payments from you, and to help us recover debts

- For general administration purposes
- To help us improve the quality of our products and services
- To help us detect and prevent fraud and money laundering
- To conduct statistical analysis
- To inform you about products and services we offer that may be of interest to you

Disclosing Personal Information

We may disclose your information, where we have a legal basis for doing so, as follows:

- To our staff, agents, suppliers, or subcontractors where it is reasonable to do so. Where your consent is required to facilitate this sharing, we will ensure it is obtained prior to processing. This may include, but is not limited to:
 - Any one of our Group of companies
 - Our manufacturer partners
 - Credit providers
 - Third party product or service providers (which you have purchased through us)
 - Our marketing agencies
 - Our insurers
 - Our auditors
 - Software providers, including, but not limited to:
 - ClickDealer Ltd
 - Techman Ltd
 - Active Campaign Ltd
 - eBay Ltd
 - Google Inc
 - Autotrader Ltd
 - Microsoft Corporation
 - EAutomotive Ltd
 - Insurance engineers
 - Third party insurance claim handlers (where you have instructed us to do so)
 - Our secure data destruction service provider
- Where your data is passed to the following types of organisations, we will act as joint controllers of your data. In these circumstances we recommend you read the Privacy Statements of these organisations. The organisations include but are not limited to:
 - Credit providers:
 - Close Brothers Finance Ltd
 - FirstRand Bank Ltd (Motonovo Finance)
 - Oodle Finance
 - Evolution Funding Ltd

We may be legally obliged to disclose your personal information, to the extent that is legally required by law, in the following circumstances:

- In connection with any on-going prospective legal proceedings
- To establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)
- Where any person asks for personal information, who we believe may apply to a court or other competent authority for disclosure of that personal information, and where, in our reasonable opinion, such court or authority would be likely to order the disclosure of that personal information.

**Except where outlined in this Privacy Statement,
we will not provide your personal information to third parties**

Security of Personal Information

We will take all reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal information.

- Digital storage of the personal information we hold will be done on secure servers, protected by passwords and firewalls.
- Data transferred electronically to and from us will be done so using secure methods, using encryption technologies where possible.
- Personal information we hold in physical form will be held securely, with access limited to only those who require it.
- We will only store your data for as long as it is reasonable to do so, after this time it will be securely destroyed.

Your Rights

- You may instruct us to provide you with any personal information we hold about you via a Subject Access Request
 - Subject Access Requests must be submitted in writing by post to: Data Protection, Progress Motor Group Ltd, Garrard Way, Telford Way Ind Estate, Kettering, Northamptonshire, NN16 8TD or via email to admin@progressmotorgroup.co.uk
 - Upon receipt of such a request we will, after confirming your identity, provide you with all relevant data in the most practical format, unless otherwise stipulated and reasonably possible, within the legally required timeframe
 - We may withhold personal information that you request to the extent permitted by law
- It is your right that any inaccuracies in the data we hold are rectified. If you believe any of the personal information, we hold on you is incorrect or out-of-date, please contact us using the details found below
- You may instruct us to destroy any or all your personal information that we hold, and we will do this as quickly as possible. We may be unable comply with this request in the following instances, where continuing to hold and process the data is required...
 - To comply with a legal obligation
 - For statistical research
 - To exercise, or in the defence of, legal claims
- You may instruct us to cease processing of all your personal information, and we will do this as quickly as possible
- You may instruct us to cease processing of all your personal data specifically for marketing purposes, and we will do this as quickly as possible. You can also...
 - Stop us sending you marketing communications by email by using the 'unsubscribe' button found on all our email marketing communications.
 - Stop us sending you marketing communications via SMS by replying to an SMS you have received from us with the word 'STOP'
 - Update which methods of communication you would like us to use to contact you by using the details below

You can enact any of your rights outlined above by writing to: Data Protection, Progress Motor Group Ltd, Garrard Way, Telford Way Ind Estate, Kettering, Northamptonshire, NN16 8TD or via email to admin@progressmotorgroup.co.uk

Progress Motor Group Ltd operate a log of Data Flow and Data Maps that details all the data we acquire and how that data is flowed through the business. We also retain logs and policies for the duration each piece of data is retained and for what purpose. Each department will hold personal data for numerous reasons of legitimate interest such as updates about your vehicle & service provided or information that may be useful or of relevance. If you would like access to these logs then please contact us by writing to: Data Protection, Progress Motor Group Ltd, Garrard Way, Telford Way Ind Estate, Kettering, Northamptonshire, NN16 8TD or via email to admin@progressmotorgroup.co.uk

ICO Registration

Progress Motor Group Ltd is registered with the ICO as follows:
PROGRESS MOTOR GROUP LTD – ZA920142

Data Protection Issues

If you have any data protection concerns or issues, or have any questions about the way we use data, please contact us by writing to: Data Protection, Progress Motor Group Ltd, Garrard Way, Telford Way Ind Estate, Kettering, Northamptonshire, NN16 8TD or via email to admin@progressmotorgroup.co.uk

Using Our Website

Our website is powered by ClickDealer Ltd (“ClickDealer”), our third-party web services provider. ClickDealer is committed to ensuring that data is processed in accordance with applicable data privacy laws and is kept secure.

When you visit our website

When someone visits our website, ClickDealer collects standard internet log information (your IP address, browser, and type of device) and details of visitor behaviour patterns (where you joined our site from, the path you take through our site and where you leave). These are stored against unique ids (which are strings of numbers). ClickDealer collects this information for the legitimate business purpose of monitoring the number of visitors to the various parts of the site, the general geographic location of visitors and engagement levels, which in turn enables it to make improvements to its websites and services and provide business intelligence. This information is only processed in a way which does not identify anyone. It is kept indefinitely.

ClickDealer also uses Google Analytics to collect standard internet log information and details of visitor behaviour patterns, which are stored against unique ids (i.e., strings of numbers). We collect this information for the legitimate business purpose of monitoring website traffic and engagement levels, which in turn enables us to make improvements to our website and the way we sell our cars and services. This information is only processed in a way which does not identify anyone. It is kept indefinitely.

Cookies

When you visit our website, progressmotorgroup.co.uk, we may save Cookies to your PC. The types of Cookies used on our website and what they do are as follows:

- **Strictly Necessary** - Strictly Necessary cookies are essential to let you move around the website and use its features, such as accessing secure areas, shopping baskets and online billing. These cookies allow our website to provide services at your request.

- **Performance** - Performance cookies collect information about how you use our website e.g., which pages you visit most often, and if you experience any error messages. They also allow us to update our website to improve performance and tailor it to your preferences. These cookies do not collect any information that could identify you - all the information collected is anonymous. They will not be used to target adverts to you on other websites.
- **Functional** - Functionality cookies are used to remember the choices you make, e.g., your username, log in details and language preferences. They also remember any customisations you make to the website to give you enhanced, more personal features.
- **Targeting** - Targeting cookies collect information about your browsing habits to deliver adverts which are more relevant to you and your interests. They also measure the effectiveness of advertising campaigns.

You can stop or restrict the use of Cookies on our website by modifying the settings in your browser. Doing this will affect all websites you visit, and you may not be able to use all the interactive features of our website. You can find information on how to disable or enable cookies by visiting www.allaboutcookies.org

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