# **Privacy policy**



Carmaster is committed to protecting your privacy. In order to provide you with the best possible service, we need to collect certain information from you. This Privacy Policy explains when and why we collect personal information about you as well as the types of personal data we may collect when you interact with us at the workshop, online or over the phone. It also explains how we will look after your data and keep it safe. There's a lot to take on board and we don't want you to be 'exhausted' and 'tyre' of it but we want you to be fully informed about your rights, and how Carmaster uses your data.

We hope that the information below covers everything but, if you have any questions at all, please drop us a line at reception@carmastergarage.com. It is likely that we will need to update this Privacy Policy every now and again to make sure it is accurate. We will inform you of any major changes but the most up-to-date version will always be here for you to check.

#### **About Carmaster**

This privacy policy sets out how Carmaster (UK) Limited, known as Carmaster or Carmaster Garage uses and protects any information.

Carmaster (UK) Limited of Units 1-4 Kindon Court, Camwal Road, Harrogate, HG1 4PT is the Data Controller. Our ICO registration number is ZA363646.

Rebecca Pullan is the Data Protection Officer and can be contacted at rebecca@carmastergarage.com

#### Legal Bases We Rely On

The GDPR law on data protection sets out a number of different reasons a company may collect and process your personal data, including:

· Legitimate interest

We require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example...

CCTV footage. The legitimate interest being that of keeping the property, vehicles, employees and visitors safe and secure. Recorded phone calls may be used for legitimate interest for quality and training purposes.

MOT reminders will be processed on the lawful basis of legitimate interests. The legitimate interest is direct marketing which is lawful under GDPR Recital 47. Customers can opt out of receiving such reminders by contacting reception@carmastergarage.com or calling reception. Additional consideration has been given to this with a legitimate interest assessment.

Consent

In specific situations, we can collect and process your data with your consent. For example... When you fill in an online booking form.

When collecting your personal data, we will always make clear to you which data is necessary in connection with a particular service and have given details on this below

· Contractual obligations

## In some instances, we need your personal data to comply with our contractual obligations. For example...

Your details are required to ensure the performance of the contract with us.

Recorded phone calls are required for verbal authority.

We need your address details to collect and deliver your vehicle.

Legal compliance

We may be legally bound to collect and process your data. For example... If someone is involved in any criminal activity or fraud affecting Carmaster, we need to pass details to law enforcement.

# **How We Collect Your Personal Data**

There are a number of ways in which we may collect information about you. These include:

- · When you have repairs or maintenance carried out.
- When you visit our website.
- · When you call our workshop team or fill in a website contact form.
- When you enter a competition, prize draw or fill in a survey.
- · When you fill in any forms at our workshop e.g. an accident report form.
- · When you engage with us on social media.
- · When you visit our workshop which has CCTV systems that may record your image.

# The Type of Personal Data We May Collect

The personal data we may collect could include your name, address, email address or telephone number. It may also denote details from conversations we have with you, information from voucher redemptions, which of our web pages you visit, information gathered by cookies in your web browser or your vehicle information. In addition Carmaster has CCTV installed, so your image will be captured when you visit.

#### How and Why We Use Your Personal Data

We use your data so we can fulfil our contractual obligations to you (such as ask permission to continue with further repairs), but also to offer you products and promotions that are likely to be of interest to you. The data privacy law allows this as part of our contractual obligations and legitimate business interest in understanding our customers and providing the highest levels of service. We will hold your data in our systems for as long as is necessary for each relevant activity or as long as is set out below. If you ever wish to change how we use your data, you can do so. Please refer to the 'Your rights over your personal data' section below.

If you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some of services you have asked for.

Here are some ways that we will use your personal data and why: To process your work in our workshop. If we don't collect your personal data during booking in, we won't be able to pre order parts, deliver and collect your vehicle and comply with our legal obligations e.g. your details are passed to our bookkeeper for record keeping. We will also keep your details in order to fulfil any contractual obligation such as warranty.

Our team needs your contact information in order to be able to respond to your queries, complaints or process a refund where necessary. We will keep a record of your information including notes on the job, how it went and what was discussed. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with high quality customer service.

We use CCTV to protect our customers, premises, assets and staff from crime. We do this on the basis of our legitimate business interests.

We may periodically send emails about specific dates relevant to your vehicle e.g. MOT or other information which we think you may find interesting using the email address which you have provided. We do this on the basis of our legitimate business interests. If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.

With your consent, we will use your personal data to keep you informed about relevant products and tailored special offers, discounts, promotions, competitions and events by email and post. As ever, you can opt out of hearing from us through these channels at any time.

To comply with our legal obligations, we will send you communications required by law or which are legally necessary e.g. significant updates to this Privacy Notice or product recall notices. These messages are to inform you about changes to the service we provide you and will not include any promotional content and so do not require prior consent when sent by email or phone. We use traffic log cookies to identify which web pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to your needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

To comply with our contractual or legal obligations to share data with law enforcement.

#### **Protection of Your Personal Data**

The security of your personal data is very important to us and we take care to handle and store it (physically, electronically and with managerial procedures to safeguard) as best we can and in line with new legislation as we know it is important to you as well as us. Here are some ways we secure your data:

- We have paid for security on each of our PC's.
- Each computer requires a daily log on.
- · We have double passworded cloud-based software for our day to day management system.
- · Job sheets are locked away when finished with in a locked metal cupboard.

## How Long Will We Assume Your Consent For Mailings?

After your initial consent to sign up to our marketing mailings, we assume you still want to hear from us if you're using us for work and for up to ten years after your last invoice.

We often only send out cards and vouchers to our most active customers with vehicles attached to their account so would suggest if you would like these please update your vehicle information regularly.

# The Length of time We Keep Your Personal Data

We only keep your data for as long as is necessary for the purpose it was collected. After that period, your data is deleted or anonymised and for example aggregated with other data to be used for business planning and analysis.

## For instance,

If you have repairs carried out with us, we keep your written job sheet for 3 years after this visit.

Your vehicle data will be kept for ten years after your last visit or until you let us know that you have disposed of your car. However, but we will keep this data anonymised and separate from your personal data.

If we don't see you for a period of ten years, we will automatically anonymise your account details.

General CCTV footage will be kept for a period of approximately 45 days. Following an incident CCTV may be saved separately for up to three years.

Recordings of all phone calls will be kept for three years.

#### Who We Need To Share Your Personal Data With and Why

At times we need to share your personal data with trusted third parties e.g. IT companies, mailing houses, credit card processing services and so on. We only provide what they need and they cannot use your data for anything other than the purposes that they have your data for.

We want your customer journey with Carmaster (from booking to collection of your vehicle) to be as smooth as possible. We use the following companies who will process your personal data as part of their contracts or terms and conditions with us:

Google Analytics - for monitoring the volume, details and actions of visitors to our website

Facebook - for personalising ads into your news feeds (which you can opt out of on Facebook)

Microsoft - we currently use the Microsoft Office 365 to host our emails

our garage management system holds your name, address, contact details and vehicles including all history. You can amend your information including opt in and out of various types of communications anytime, see more in this below.

Blue J - MOT, service and timing belt reminders are printed on our behalf by a marketing company and so your details will be passed to them unless you opt out of the reminders as above.

MVH Bookkeeping solutions / CCF Accountancy - your name and contact details will be passed to a bookkeeper and accountant in order to maintain correct accounts

Your name and contact details may be passed to a feedback provider so that they can contact you to gain independent feedback on our services.

Your details are stored on our PC which periodically may require repair or upgrade from the computer company.

\*Please note the above suppliers are non-exhaustive and may change from time to time, but we will endeavour to keep the list above accurate and as up-to-date as possible.

# **Sharing Your Data With Third Parties For Their Own Purpose:**

We will never sell or trade your contact details with any third parties.

There are some instances where we may have to share your information based on our legal obligations, for instance:

If the police/government ask us to disclose information we may be required to share your personal data with them, however we would assess this sort of request very carefully.

For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

#### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. For further information please contact our Data Protection Officer.

## Your Rights Over Your Personal Data

You have a choice as to whether or not you receive marketing information from us and you can withdraw your consent from all our communications at any time. How can you stop the use of your personal data for direct marketing?

## There are several ways you can stop direct marketing communications from us:

Click the link in any email or text communication that we send you. We will then 'unclick' which correspondences you prefer not to have.

Call us at the workshop 01423 881 213

Contact us at reception@carmastergarage.com

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated. We estimate no longer than 1 week for email and 2 weeks for postal communications.

## Requesting access and making changes to your personal data

You also have the right to access and rectify mistakes in the data we hold about you at any time.

These requests will be handled on a case by case basis and we estimate will be processed in no longer than 2 weeks depending on our legitimate business interests, legal and contractual obligations. If we refuse your request we will explain to you the reason for our refusal.

You can also make any changes to your personal information by contacting our reception on by telephone (01423 881 213) or email (reception@carmastergarage.com).

In order to keep your information confidential, we may ask you to verify your identity before proceeding with any requests. If there is a third party acting on your behalf, we will check that they have your permission to act.

## **Legitimate Business Interests**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

## **Contacting the Regulator**

If you are at all unhappy about the handling of your data, you can send a complaint to the Information Commissioner's Office by calling 0303 123 1113 or go online to www.ico.org.uk

# Questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, email us at rebecca@carmastergarage.com, or write to us at Carmaster, Units 1-4 Kindon Court, Camwal Road, Harrogate, HG1 4PT