

# LOOKERS PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect when you:

- place an order for a vehicle, parts or services;
- communicate with us about your order or purchase;
- contact us about a vehicle, parts or services you are considering ordering, including arranging a test drive;
- otherwise make an enquiry; or
- browse our website.

References to we, our or us in this privacy notice are to the Lookers Group (being Lookers plc and each of its subsidiaries named in the appendix to this notice, trading under the "Lookers", "Charles Hurst" and "Taggarts" names).

Lookers plc is registered in England and Wales under company number 111876 and our registered office is at Lookers House, 3 Etchells Road, West Timperley, Altrincham, WA14 5XS. You can find the details of the Lookers Group company that you are dealing with at <http://companydetails.lookers.co.uk>.

## 1. PERSONAL INFORMATION

- When you interact with us, particularly when you purchase a vehicle, parts or services, you may provide us with personal information about you, such as your name, address, gender, date of birth, telephone number, email address, occupation or job title, payment and financial information, including bank details, information about your vehicle including service history and your motability details.
- You may also need to provide us with a copy of identification documents such as your passport, driving licence and/or a utility bill. These documents will include additional personal information about you such as (depending on the nature of the document) your nationality, place of birth, photograph and passport / driving licence number.
- Depending on the nature of our interactions with you, there may be certain essential personal information that we have to collect from you so that we can provide you with the information, goods or services that you have requested. This will vary depending on the relationship we have with you.
- For example, if you contact us with an enquiry about a vehicle you are interested in purchasing we will need to collect contact details so that we can get in touch with you. If you then decide to place an order for that vehicle we will need to collect additional information so that we can process that order, including your postal address and payment information.
- We may also ask you for additional personal information which it is optional for you to provide but which will allow us to improve the service that we provide to you. For example, you may provide us with additional contact details to make it easier for us to get in touch with you, or with additional information about your circumstances and preferences to allow us to better tailor our services to you.
- We will always aim to make it clear which personal information it is necessary for you to provide and which personal information is optional. However, if you are unsure as to

whether you are required to provide any particular piece of personal information please ask.

- Each of our dealerships has CCTV for security purposes and the safety of our staff. We may therefore collect CCTV footage of you if you visit our premises.

## 2. USES MADE OF THE INFORMATION

- We are committed to protecting your privacy, and will only use your personal information in accordance with applicable data protection legislation, including the Data Protection Act 2018 and the General Data Protection Regulation and the UK implementing legislation.
- Specifically, we may use your personal information as follows:
  - to perform our obligations in respect of an order you place, including:
    - fulfilling any order that you place for a vehicle, parts or services;
    - authorising payments;
    - maintaining guarantee and service records;
    - providing after sale services (including vehicle support, maintenance and repair services including warranty services); and
    - to respond to correspondence you send to us and fulfil the requests you make to us for test drives, service requests, brochure requests or information about specific vehicles.
  - where you have expressly consented to us doing so, including:
    - where you have asked us to enquire about or obtain finance for you to contact brokers and finance companies, to try to find and put in place the finance you require;
    - where you have requested that we keep you up-to-date with news, updates, promotions and events, by the types of communication that you have asked us to use;
    - where you make an enquiry or request any particular information, to respond to that enquiry and provide the requested information;
    - where you have asked us to arrange a lease of a vehicle with a third party; and
    - where you have asked us to process a change of ownership of your vehicle.
  - where it is necessary to protect your vital interests, including where we need to tell you about a potential safety issue or product recall;
  - where it is necessary for compliance with legal obligations, including:
    - for record keeping and regulatory compliance purposes;
    - for carrying out checks to prevent money laundering; and
    - for registering your vehicle with the Driver and Vehicle Licensing Agency
  - where we otherwise have a legitimate interest in doing so, including:
    - Sharing your personal information within the Lookers Group and/or with the manufacturer of a vehicle you purchase, as described in more detail in paragraphs 3 and 4;
    - verifying the accuracy of information that we hold about you and create a better understanding of you as a customer;
    - for network and information security purposes so we can take steps to protect your information against loss, damage, theft or unauthorised access;
    - to comply with a request from you regarding the exercise of your rights;
    - to inform you of an update to our terms and conditions and policies;
    - carrying out checks to prevent fraud to protect us from dishonest activity;
    - reminding you about vehicle services and MOTs which are due to ensure (where applicable) the continued validity of any warranty, that your

vehicle remains safe and legal to drive and to maintain our customer relationship with you;

- reminding you of your options exercisable at the end of a finance agreement;
- advising you of options available to you which we believe you will find beneficial during the course of your finance agreement;
- Informing you about our range of vehicles in your preferred brand including new vehicles;
- to administer competitions and promotions that you enter with us from time to time and to distribute prizes;
- analysing, evaluating and improving our services so that your visit to our website, applications and customer service centre are more useful and enjoyable;
- using automated methods to analyse, combine and evaluate information that you have provided to us so that we can deliver the most appropriate customer service 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);
- undertaking market analysis and market research (including contacting you with customer surveys) to enable us to improve the service we offer and 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; ensuring that our website is presented in the most effective manner for you and your computer and tracking your use of our website through the use of cookies and log files to help us to provide a positive user experience and improve and increase usage of our website;
- to provide access to our Wifi service and prevent unauthorised use of that service;
- operating a CCTV system on our premises to protect the safety and security of our staff, vehicles and property; and
- storing phone call recordings and other communications and queries received from you for both quality improvement and staff training purposes.

### 3. SHARING OF YOUR PERSONAL INFORMATION WITHIN THE LOOKERS GROUP

- The Lookers Group consists of various companies. Where you provide personal information to one company within the Lookers Group it may be shared with other companies within the Lookers Group. This is in our legitimate interests to enable us to operate our Group effectively and to provide you with an efficient service.
- All members of the Lookers Group are bound by this privacy notice.

### 4. SHARING OF YOUR PERSONAL INFORMATION WITH THE MANUFACTURER

- We work closely with a variety of different vehicle manufacturers to bring you a wide range of vehicles to choose from. In some cases this means that we operate our dealership on a “franchised” basis, which means that it trades using the manufacturer’s name and branding. In other cases the dealership will trade under our name and branding, but we still work closely with the manufacturer to ensure that you are provided with the best possible service.

- Whether you purchase the vehicle from a dealership operating under the manufacturer's branding or our own, your personal information will in the first instance be collected by us and will be used for the purposes described in paragraph 2. We will also share your personal information with the manufacturer to be used for purposes such as recalls and market analysis.
- In addition, where you have provided your consent, the manufacturer may use the personal information that you have provided to us to send you marketing communications (we may ask you for consent on the manufacturer's behalf and where we do so we will pass your preferences, including any changes to these preferences, onto the manufacturer).
- We share your personal information with the manufacturer because:
  - it is in our legitimate interest to do so, as we are required to do so by the terms of our agreement with the manufacturer and to maintain our on-going relationship with the manufacturer;
  - it is required to fulfil your order or other transaction, handle complaints or provide you with a service or information that you have requested;
  - it is in the manufacturer's legitimate interest to have that information, to enable it to communicate important information to you, better understand customer demographics and requirements and (where you have agreed to receive marketing communications) to send you information that it believes may be of interest to you; and
  - it is also in your interest that we share your personal information with the manufacturer, so that you can receive important safety information and other relevant communications.
- The manufacturer has its own responsibilities to you for any use it makes of your personal information and will have its own privacy notice which will provide you with more information about how the manufacturer uses your personal information. You can contact the manufacturer directly if you require more information about how the manufacturer will use your personal information or if you want to exercise any of your rights in respect of the manufacturer's use of your personal information.

## 5. OTHER CIRCUMSTANCES IN WHICH WE MAY SHARE YOUR PERSONAL INFORMATION

- We may also share your personal information with:
  - a finance provider and/or broker for the purposes of investigating the options available to you, obtaining a proposal and putting that finance agreement in place;
  - a third party providing value added services to you such as:
    - an insurance provider;
    - roadside assistance service providers;
    - customer contact centres;
    - mobility and car hire providers;
    - any party you have given us permission to speak to (such as a relative or friend), your motor insurance company and other people and companies associated with you
    - providers of outsourced services, such as
    - hosting and IT support or maintenance services and IT security (to the extent necessary for the provider to provide those outsourced services to us);
    - direct marketing communications agencies and consultants;
    - market research and market analytics service providers;
    - legal, accountancy, auditors and other professional advisers;

- data storage and destruction companies;
  - customer loyalty programmes
- our employees and employees of the manufacturer of your vehicle
- third parties with which we may choose to improve our processes, products or services or to investigate the possibility of new processes, products or services.
- the prospective seller or buyer of any business or assets in the event that we sell or buy any business or assets.
- Finance providers may further share your personal information as follows:
  - to credit reference agencies for the purposes of carrying out searches, a record of which searches will be kept and may be used by other entities in assessing applications from you and/or members of your household for credit in the future; and
  - to other lenders for fraud detection, monitoring and prevention purposes.
- We may also share your personal information with third parties if we are under a duty to share your personal information in order to comply with any legal obligation, or in order to enforce or apply such other terms as apply to our relationship, or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We may share anonymised and aggregated information about our customers to third parties, such as advertisers, to allow them to select and send relevant adverts to our customers. We may also use such anonymised aggregate information to help advertisers reach the kind of audience they want to target.

## 6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

- In certain cases the sharing of your personal information to a third party as described in paragraphs 4 and 5 may involve your personal information being transferred outside of the United Kingdom (for example to vehicle manufacturers based in other countries). This may be to:
  - a country in the European Economic Area or that is otherwise considered to have data protection rules that are equivalent to those in the United Kingdom; or
  - a country which is not considered to have the same standards of protection for personal data as those in the United Kingdom, in which case we will take all steps required by law to ensure sufficient protections are in place to safeguard your personal information, including where appropriate putting in place contractual terms approved by the relevant regulatory authorities.

## 7. RETENTION, UPDATING AND REMOVAL OF YOUR PERSONAL INFORMATION

### RETENTION

Our ethos is “for you, for life” and, whether you are contacting us for the first time or have been a customer for a while, we hope that we will be able to continue to be of service to you in future. With this in mind, where you provide us with personal information we may retain this information for future use, including:

- providing important follow-up information on your purchase, such as letting you know when your next vehicle service is due;
- undertaking surveys or market research regarding your purchase or regarding your experience of dealing with us;
- providing you with news and updates of a type you have asked to receive;
- monitoring fraud and other illegal or unlawful activity; and

- record keeping purposes.
- The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements. How long we keep data is primarily determined by how long we need it for the purposes we told you we were going to use it for, time periods set out in law and the period we need to keep it to defend ourselves against legal action. We also retain certain details for such period as may be necessary to validate and handle any motor insurance claims we receive after the statute of limitations has expired and any claims we receive where the claimant was not aware of the injuries until a long time after they were caused.

## RIGHT TO RECTIFICATION

- it is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. You may be able to update some of the personal information we hold about you through our customer portal. Alternatively, you can contact us using the details in paragraph 13.

## RIGHT OF ACCESS

- You have a right to know what personal data we hold on you, why we hold the data and how we are processing the data. Please send you request using the details in paragraph 13 with as much information and detail as possible to help us identify the information you wish to access (ie date range, subject of request) and to allow us to deal with your request efficiently. To answer your request, we may ask you to provide identification for verification purposes.
- You have a right to know what personal data we hold on you, why we hold the data and how we are processing the data. Please send you request using the details in paragraph 13 with as much information and detail as possible to help us identify the information you wish to access (ie date range, subject of request) and to allow us to deal with your request efficiently. To answer your request, we may ask you to provide identification for verification purposes.
- Upon receipt of a request, we will have 30 days to provide a response, with an extension of two further months if required. If we require more time to deal with your request, we will notify you of the delay, and the factors resulting in the delay, within 30 days of the receipt of the request. If we refuse your request, we will notify you within 30 days of the receipt of the request accompanied by the reason for the refusal.
- We will not charge a fee for any requests, provided we do not consider them to be unjustified or excessive. If we do consider these to be unjustified or excessive, we may charge a reasonable fee (also applicable for multiple copies) or refuse the request.
- You are entitled to contact the Information Commissioner's Office (ICO) (or the Office of the Data Protection Commissioner in the Republic of Ireland) if we refuse your request.

## RIGHT TO UNSUBSCRIBE FROM MARKETING

- Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in paragraph 13. Please note however that the withdrawal of your consent will not affect any use of your personal information made before you withdrew your consent.
- If you want to stop receiving any information from us, such as news and updates , please let us know by updating your preferences through our customer portal or contacting us using the details in paragraph 13. It may take up to 28 days to unsubscribe you from marketing.
- Your decision to stop receiving information from us may result in the deletion of some of the personal information that we hold about you, but we may still retain personal information we require for other purposes, including where it is required for record keeping purposes.

## RIGHT TO BE FORGOTTEN

- In certain circumstances you may be entitled to request the erasure of personal information that we hold about you:
  - If the personal data is no longer required for the purposes for which it was obtained;
  - Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
  - If the personal data is being unlawfully processed;
  - Where you object to the processing of personal data and there are no overriding legitimate grounds for the processing;
  - If your personal data requires deletion in line with legal requirements
- To make a request of this nature, please contact us, providing full details of the personal information you want to be erased and the reason(s) for your request. We will consider all requests upon receipt and confirm to you whether we are able to agree to your request.
- In certain circumstances we may need to retain some information to ensure your preferences are respected on completion of our duties. For example, we cannot erase all information about you where you have also asked us not to send you marketing material. Otherwise, your preference not to receive marketing material would be erased.

## RIGHT TO RESTRICTION

- You have the right to restrict the extent of personal data processed by us in circumstances where:
  - You believe the personal data is not accurate (restriction period will exist until we update your information);
  - The processing of the personal data is unlawful but you wish to restrict the processing of data rather than erase it;
  - Where the personal data is no longer required by us but you require the retention of the data for the establishment, exercise or defence of a legal claim;
  - You have a pending objection to the processing of your personal data. Where processing is restricted, your personal data will only be processed with your consent for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest. We will contact you to confirm where the request for restriction is fulfilled and will only lift the restriction after we have informed you that we are doing so.

## RIGHT TO DATA PORTABILITY

- You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine readable format where:
  - Processing is completed on the basis of contract;
  - Processing is completed based on the provision of your consent;
  - Processing is carried out by fully automated means.
- You may also request that we send this personal data to another data controller where technically feasible.

## RIGHT TO OBJECT

- You have the right to object to the processing of your personal data. However, the processing must have been undertaken on the basis of legitimate interest by us. If you wish to object to the processing of data, please contact us with your request as described in paragraph 13. We will then stop processing your personal data unless it is required for legal proceedings.

## RIGHT NOT TO BE SUBJECT TO AUTOMATED DECISION MAKING INCLUDING PROFILING

- You have a right not to be subject to a decision based solely on automated processing or profiling where such decisions would have a legal effect or a significant impact on you. In such circumstances you have a right to object to such processing.

## 8. CALL RECORDING

- Please note that all calls may be recorded for training, monitoring and quality purposes. All recordings will be handled strictly in accordance with the provisions of this privacy notice.

## 9. COOKIES AND LOG FILES

- When you browse our website, we may use “cookies” to keep track of your visit and give you a better browsing experience. Please see our cookie policy at <https://www.lookers.co.uk/cookie-policy> for more information.
- In common with most websites, our website logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp. We may use this information to analyse trends, administer the website, track your movement around the website and gather broad demographic information.

## 10. SECURITY

- The protection of your personal information is very important to us and we have in place various security measures to ensure that your personal information is kept secure.
- However, you should be aware that the method you use to get in contact with us, such as email or post, may not be entirely secure and your personal information may be susceptible to being intercepted in transit. Equally, your personal information is at risk if a



malicious third party gains access to your account on our customer portal or to any other place where your personal information is stored, such as your email account.

- You should therefore take all reasonable steps to keep your personal information secure, including choosing a secure password for your account on our customer portal and your email account and not disclosing your passwords to anybody else. You should use a unique password for every account.
- We will never:
  - call or email to ask you for your online banking details (eg passwords, pass phrases etc);
  - send someone to your home who cannot identify themselves as a Lookers employee to collect cash, bank cards or anything else relating to your financial information;
  - ask you for personal or banking information by email or text message;
  - email you with a link to a page which asks you to enter any banking log-in details;
  - ask you to authorise the transfer of funds to Lookers or any of its employees; or
  - provide motor sale services through any mobile apps other than Lookers official apps.
- If any of the things listed above happens, the person contacting you or advertising the services is not working for us or on our behalf and you should not under any circumstances provide any personal information or money.
- If you suspect you have been the target or victim of fraud:
  - contact us immediately, by phoning 0161 291 0043 or by contacting your sales executive or dealership using the number shown on our official website or other communications you know to be legitimate;
  - report the fraud to the police through Action Fraud either via the website [www.actionfraud.police.uk](http://www.actionfraud.police.uk), by phoning 0300 123 2040 or by textphone 0300 123 2050 (in an emergency dial 999); and
  - beware of other scams, particularly people offering to recover funds you have lost.

## 11. ENQUIRIES, ISSUES AND COMPLAINTS

- You are entitled by law to ask for a copy of your personal information at any time. Please contact us using the details in paragraph 13.
- In the unlikely event that you have any concerns about how we use your personal information, please contact us as described in paragraph 13. This includes situations where you want to request the rectification or erasure of your personal information, restrictions to be placed around how we use your personal information, or to object to a particular use.
- If you make a complaint about our handling of your personal information, it will be dealt with in accordance with our complaints handling procedure accessible at [www.lookers.co.uk/web/customer-complaints-policy](http://www.lookers.co.uk/web/customer-complaints-policy).
- If we are unable to resolve your complaint, you may make a complaint to the Information Commissioner's Office. Please see <https://ico.org.uk/for-the-public/raising-concerns/> for more information.

## 12.CHANGES TO THIS PRIVACY NOTICE

- We reserve the right to alter this privacy notice at any time. Such alterations will be posted on our website. You can also obtain an up-to-date copy of our privacy notice from any dealership or by contacting us as described in paragraph 13. Should you object to any alteration, please contact us.

## 13. CONTACTING US

- If you need to contact us about this notice or any matters relating to the personal information we hold on you, you can write to the Data Protection Officer, Lookers House, 3 Etchells Road, West Timperley, Altrincham, WA14 5XS or email [GDPRHelp@lookers.co.uk](mailto:GDPRHelp@lookers.co.uk).
- In addition, requests to unsubscribe from marketing purposes can be made through the customer portal or by emailing us at [GDPRHelp@lookers.co.uk](mailto:GDPRHelp@lookers.co.uk) stating "UNSUBSCRIBE" in the subject line.

## 14. FURTHER INFORMATION

- We hope that the contents of this privacy notice address any queries that you may have about the personal information we may hold about you and what we may do with it. However, if you do have any further queries, comments or requests, please contact us as described in paragraph 13 above.
- Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/> (or the Data Protection Commissioner's website in the Republic of Ireland which can be found at: <https://www.dataprotection.ie/docs/Home/4.htm>).