



# VINDIS GROUP PRIVACY NOTICE

At Vindis we are committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who contact us, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

## 1. Who we are?

Vindis is a family owned business and we are committed to protecting and respecting your privacy. We are the data controller (contact details below). This means we decide how your personal data is processed and for what purposes.

## 2. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in, or likely to come into, the data controller's possession. The processing of personal data is governed by the General Data Protection Regulation (GDPR).

Data collected:

- Name
- Address
- Contact Details – E-mail and telephone
- Vehicle details
- Lifestyle
- Voice recordings of telephone calls
- 'Live Chat' records
- Cookie, Pixels or Beacon information (for more details please see our Cookie Policy)
- Where you engage with us in a business context, we may collect your job title, company contact details (including email addresses), fleet size and company details (some of which we may obtain from an online or public business directory).

When purchasing a new car, we are also required to collect your date of birth, a requirement of the DVLA.

If you opt to use our funding facilities we will also collect additional information on behalf of the Finance Company. This information is sent electronically by us and is not retained once the application is submitted.

## 3. How do we process your personal data?

We comply with our obligations under the Data Protection Act (DPA) and the General Data Protection Regulation (GDPR) by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

## 4. What is the legal basis for processing your personal data?

The uses of your data detailed along with the basis for each one.

Legal basis for processing	What we use your personal information for	Explanation
Contract	<ol style="list-style-type: none"> <li>To process, and keep you informed of the progress of, an order or service/repair.</li> <li>To setup protection policies or register product guarantees that you have purchased from our Insurance Provider.</li> </ol>	Processing is necessary for us to fulfil either a verbal or written contract for the supply of goods or services.
Consent	<ol style="list-style-type: none"> <li>To propose a finance agreement.</li> <li>To carefully selected partners</li> </ol>	We will only use your data for this purpose with your explicit consent.
Legal Obligation	<ol style="list-style-type: none"> <li>To provide you, if required, with a Statement of Demands and Needs.</li> <li>To register a new car</li> </ol>	Processing is necessary for compliance with a legal obligation.
Legitimate Interest	<ol style="list-style-type: none"> <li>To advise you of recommended maintenance, service and MOT requirements for your vehicle.</li> <li>To update the manufacturer with your current contact details and vehicle service and repairs.</li> <li>To allow the provider of the manufacturers, and our Customer Experience Feedback programme to contact you.</li> <li>To setup your Warranty and, when applicable, make a claim.</li> <li>To register an MOT.</li> <li>To advise you of new models.</li> <li>To keep you updated on Vindis Upgrade.</li> <li>To maintain our own accounts and records.</li> <li>To share your contact details with Vindis Group Ltd who provide Sales and Aftersales contact services for us.</li> <li>To keep you informed of our current offers, news, charity work, competitions and events across the Group</li> </ol>	Processing is necessary for us to carry out our duty of care and to ensure all customers receive a level of service in line with your, our and the manufacturers expectations.

## 5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with the following companies in order to carry out our duty of care and, in any event, only if it's part of the service we are providing for you. We do not provide your data to any other company or sell it to Third Parties.

- The manufacturer.
- The manufacturer's New warranty provider.
- The manufacturer's Used warranty provider,

For Audi, Volkswagen, SEAT and ŠKODA this is VWFS & Opteven Services SA to provide you with the product and notify you about important changes or developments to the features and operation of those products and services

- Manage your account, including responding to your enquiries and complaints
- Comply with audits
- Carry out risk management
- Carry out customer modelling, statistical and trend analysis, with the aim of developing and improving products and services

VWFS may share your information with other Volkswagen Group companies for audit purposes, risk management and to carry out customer modelling, statistical and trend analysis, with the aim of developing and improving products and services, and to comply with legal requirements. We will not disclose your information to anyone else except:

- Where the law says we may or must do so
- To companies that provide services to VWFS and/or Volkswagen Group United Kingdom Limited to perform activities relating to your contract and/or to protect our rights and/or property

- To our franchised retailers to manage claims under your warranty cover

If your personal information is stored outside of the UK, we will require your personal information to be protected to UK standards. Further information on how your information is used, how we maintain the security of your information, your right to access information we hold on you and details of relevant third party and Volkswagen Group companies for data sharing purposes is in our Privacy Policy which is available:

- At their website: [www.insurewithvolkswagen.co.uk](http://www.insurewithvolkswagen.co.uk)
- By contacting them at [DPO@vwfs.co.uk](mailto:DPO@vwfs.co.uk)
- From the retailer submitting your application for our product

For Bentley and Ducati the used warranty provider is Car Care Plan

- The manufacturer's, and our, Customer Experience Survey provider.
- The manufacturer's marketing agency.
- Companies we have a joint venture or agreement to co-operate with.
- Driver and Vehicle Licensing Agency.
- Driver and Vehicle Standards Agency.
- Key providers of products and services, including insurance products, which are part of the service we offer
- Our providers of business solutions software such as Customer Relationship Management and Dealer Management Software.
- Our marketing partners for text and print fulfilment services.
- Vindis Group Ltd who provide Sales and Service contact services for us as well as keeping you informed on the latest news, events, launches and charity work across the group.
- Our marketing partners for text, email and print fulfilment services
- Tree Nation, a non-profit organisation supporting us in achieving our carbon neutral objective as an organisation. Tree Nation restore forests, create jobs, support local communities and project biodiversity worldwide.

We will only share your data with other third-party companies if:

- They are compliant with the GDPR.
- They do not use your data for any purpose other than that for which it was provided.
- You have given your explicit consent.
- Or, should the Vindis Group acquire or dispose of businesses in the future, we may also share your personal information. If a change to our Group happens, then other parties may use your data in the same way as set out in this notice.

In addition, there may be legal requirement to release information such as for the prevention, investigation, detection or prosecution of criminal and Road Traffic offences amongst others, plus Civil enforcement or Parking Toll, Bus Lane or other infringements.

## 6. How long do we keep your personal data?

We only keep data for as long as there is a legal requirement, needed, consented or for the purpose it was given.

1. An enquiry from a new customer that hasn't opted in and not purchased from us - 12 months after the last contact date.
2. An enquiry from a new customer that has opted in but not purchased from us - 18 months from the opt in date.
3. Existing customers, and customers that purchase a product or service from us, 7yrs from the date of the last purchase from us (Sales or Aftersales). This also meets other requirements for retaining contracts and our duty of care.

## 7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right to withdraw your consent to the processing at any time.

- The right to request that the data controller provide the data subject with his/her personal data and, where applicable, to transmit that data directly to another data controller, (known as the right to data portability).

[Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means].

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, (where applicable). [Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics].
- The right to lodge a complaint with the Information Commissioner's Office.

## 8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will publish an updated policy explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions, this can be found on [www.vindisgroup.com](http://www.vindisgroup.com). Where and whenever necessary, we will seek your prior consent to the new processing. A copy of the Privacy Policy for the manufacturer can be found on their website as listed below

[audi.co.uk](http://audi.co.uk)

[skoda.co.uk](http://skoda.co.uk)

[volkswagen-vans.co.uk](http://volkswagen-vans.co.uk)

[bentleymotors.co.uk](http://bentleymotors.co.uk)

[volkswagen.co.uk](http://volkswagen.co.uk)

[ducati.com](http://ducati.com)

[seat.co.uk](http://seat.co.uk)

## 9. Contact Details

To exercise all relevant rights and/or queries, or to make a complaint, please email [datahelp@vindisgroup.com](mailto:datahelp@vindisgroup.com)

You also have the right to complain to the Information Commissioner's Office. To report a concern visit: <https://ico.org.uk/concerns/> or you can call their helpline on 0303 123 1113.