

Customer Privacy Notice

Introduction

Steer Automotive Group are committed to protecting your personal data.

In this privacy notice we will explain what personal data we collect about you, how we will use it, how long we retain your data, who we will share it with, your rights as a data subject, how you can manage the information we hold on you and how you can contact us.

We use your personal data in order to carry out our contractual obligation to repair your vehicle. We do not sell your information. We may share your personal data with our trusted third party companies in order to carry out the repair. We may also share your personal data with authorities as part of our legal obligations.

We will not use your information for marketing unless you have given consent. Consent will always be freely given and you will be able to withdraw consent at any time. We may contact you from time to time to update you or for reasons in relation to your vehicle.

We only retain your personal information for as long as necessary in line with our warranty length and business and legal reasons.

This privacy notice is subject to change and we advise you to check every so often. Where possible we will contact you directly to inform you of any changes.

Data we collect

We will collect personal information from you directly or we will be passed your personal information from one of our work providers. We only collect information that is necessary to perform our contract with you.

We will collect the personal information referred to below for the purposes stated. We may use it for other purposes in the future if reasonable to do so and will tell you in advance. We may from time to time require other information, in which case we will tell you why before we collect it.

Types of personal data:

1. Name - (including title)
2. Address - (home, work etc)
3. Post code - (home, work etc)
4. Telephone - (home, work, mobile etc)
5. Email - (home, work etc)
6. Signature
7. Vehicle information – (registration, VIN, Make and Model, Mileage, Fuel level)
8. Claim number
9. Policy number

If you require one of our courtesy cars:

10. Driving licence number
11. Driving licence expiry date
12. Date of birth

If you have an excess to pay or for work carried out on your vehicle:

13. Name of bank
14. Account number
15. Sort code
16. Card payment long number
17. Card payment start date
18. Card payment expiry date
19. Card payment CVV

If you are a business we may collect:

1. Company name
2. Company address
3. Company Post code
4. Company telephone
5. Company email
6. Company fax number
7. Employee names
8. Employee email
9. Employee telephone
10. Bank details
11. Account number
12. Sort code

Special categories of Personal Information

We do not collect special categories of personal information

Call recording and monitoring

We may record any telephone call you make to our sites.

CCTV

We record CCTV footage at all our repair sites for the purposes stated.

Third Party Personal Data

We will collect any data you provide us.

If you decide to provide another person's details, you confirm that those persons are aware that you have provided their data to Steer Automotive Group and furthermore that they consent to Steer Automotive Group and/or relevant companies storing, transferring (where necessary) and using their data for the purposes for which you provided such data.

When data is collected

Data is collected by us when we collect or receive your vehicle.

We will receive your information if you make a claim and a referral is sent to us by one of our affiliated work providers.

How your data is used

We will only process your data for the reason it was collected. These will be for the performance of a contract, legitimate reasons, legal reasons or for your vital interests. If we require consent to processes your personal data it will be freely given and you will be able to withdraw your consent at any time.

- **Contractual Performance**

We will use your information to carry out the repair process to your vehicle.

We may contact you from time to time to update you on your repair process.

Driving Licence

We use you driving licence details in order to provide you with one of our courtesy cars.

Bank details

We use your card payment details to pay for the services provided

- **Legitimate Interest**

Call recording

We may record any telephone calls:

- To ensure our customer services are met
- For training purposes

CCTV

We use CCTV at all our repair sites for the following reasons:

- Prevention or detection of crime disorder
- Apprehension and prosecution of offenders
- Interest of public and employee Health and Safety
- Protection of our property, assets and employees

All cameras are located in prominent positions within public view.

Signs are placed at all entrance points to premises and throughout the site to ensure customers and visitors are aware they are entering an area that is covered by CCTV surveillance equipment. The signs include details on the purpose, who monitors it and contact details.

We do not and do not have the facility to use automatic facial recognition.

Warranty

We use your personal data to provide a warranty on your vehicle

- **Consent**

Marketing

Where you have given consent to market you, we will send you our marketing and promotional materials for services, products, surveys, competitions, events and other activities we think useful to you.

You can withdraw your consent to any marketing at any time by writing to us at the address in the manage your data section below

**Lawful basis for processing:
Contractual performance**

We will use your personal data in order to perform a contract with you.

Legitimate Interest

We may use your personal data for our legitimate interests except where such interests are overridden by the data subject.

Legal reasons

We may use your personal information in order to fulfil our legal obligations

Vital interest

We may use your personal information if there is urgent safety concerns relating to yourself

Consent

We may process your personal data if you have given us consent to do so.

Who your personal information is shared with

We will not sell your personal data and we will only share your personal data with our trusted third party companies if we have to sub contract parts of the repair.

Employees within our company who for example have responsibility for the repair process, administration of payment will have access to your data which is relevant to their job function.

We only share personal information on a need to know basis.

We will only share your personal information in order to repair your vehicle. We will share your personal information with our trusted third party companies. We may also share your personal information with the authorities to comply with our legal obligations.

We may pass on certain parts of your information to:

- Car hire companies
- Recovery companies
- Parts suppliers
- Repair sites within the Steer Automotive Group and Quicks ASR Group
- Authorised garages
- Our legal and professional advisors for example accountants
- Authorities regarding parking charges, speeding charges etc
- Our trusted third party companies

Card payments

We may have to take your excess payment if applicable including for provision of any work carried out.

Steer Automotive Group Ltd do not save any of your card payment details. We use a third party company to process our payment transactions.

Transfer and Use groupwide

As a member of a group of companies, your Personal Information will be used within the group of companies listed below and all of its parent and affiliated group entities (“Group”) for the Purposes stated.

- Any Branch falling into the Steer Automotive Group
- Any Branch falling into the Quicks ASR Group

Sending Data Abroad

We may send you personal data within the EEU and we will follow the guidelines.

If it is necessary to send personal data outside the EEU we will adhere to the guidelines.

How long your personal data is kept

We only keep your personal information for as long as necessary.

We keep your personal information for warranty purposes, business reasons and legal reasons.

Personal data security

Steer Automotive Group take the security of your personal data very seriously.

We have put in place procedures and other appropriate security to protect the personal information you share with us. We destroy it using secure or certified methods of destruction when no longer needed.

Where relevant we will anonymise your personal data.

We have a data processing agreement in place with third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

Failure to Provide Data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you to repair your vehicle. This could include being unable to repair your vehicle or to supply you with a courtesy car for example.

How you can manage your personal data

As an individual you have the right to access your data and correct or delete the personal data we hold on you. You have the right to withdraw any consent you have given.

If you would like to exercise any of your rights please do so in writing, we will require proof of identity and will respond within 30 days after receiving the request.

Below are the rights you have under the GDPR as an individual:

Your rights:

- To be informed
 - You have the right to be informed how your personal data will be used
- To access
 - You may request a copy of the personal data we hold on you
- To rectification
 - You have the right to rectify any personal data that is inaccurate or incomplete
- To erasure
 - You have the right for your personal data to be deleted and to be forgotten by us
- To restrict processing
 - You have the right to restrict the personal data we process
- To data portability
 - You have the right to request the transfer of your personal information in a structured format
- To object
 - You have the right to object to the use of your personal data
- The right(s) in relation to automated decision making and profiling
 - You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or significantly affects you
 - We do not use automated decision making or profiling when processing your personal data
- Consent
 - You may withdraw consent when we rely on it.

If you wish to exercise the above rights, manage or update your information, you can do so by contacting us using the details below:

Email: DataProtection@steer.co.uk

Post: Steer Automotive Group Ltd, 13 March Place, Gatehouse Way, Aylesbury, Buckinghamshire, HP19 8UG.

If you are unhappy, you have the right to lodge a complaint with the supervisory authority in your EU state, your place of work or at the place of the alleged infringement.

You can contact the Information Commissioners Office, the supervisory authority in the UK, at the address below:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Email: casework@ico.org.uk

Telephone: 0303 123 1113

Changes to this Policy

This Policy was last updated on 07/02/2019

This privacy notice is subject to change and we advise you to check every so often. Where possible we will contact you directly to inform you of any changes.

Appendix

Third Party Privacy Notices

If you require insurance for one of our courtesy cars we will pass on your details to Day Insure. Their Privacy Notice can be found here:

<https://www.dayinsure.com/privacy-policy/>

If you make a card payment, we will pass on your information to the following to process the payment. Their Privacy Notice can be found here:

<https://www.worldpay.com/uk/worldpay-privacy-notice>