## **PRIVACY POLICY**

Manchetts Ltd, Manchetts (Burwell) Ltd and Manchetts PB are all part of Manchetts (Holdings) Ltd. This privacy policy explains how we use any personal information that we collect about you during our work.

What information is being collected?	We collect information about you when you arrange for one of our companies to provide either a service or product to you. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. Website usage is collected using cookies.
Who is collecting it?	Manchetts Ltd (03960925) Manchetts Burwell Ltd (00696950) and Manchetts PB Ltd are the three trading entities controlled by Manchetts Holdings Ltd.
What is the lawful basis for processing data?	We process data for a legitimate commercial interest that is pursued by the Company or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.
Why is it being collected?	We collect information about you under the above basis so that we may process your order, manage your work requests, enquiries and, if you agree, contact you about other products and services we think may be of interest to you from within the Manchett group of companies.
How do we monitor the need for data?	We periodically evaluate our processes to consider whether the lawful basis remains correct. We look to ensure whether we continue to need to collect the data requested, then review this to ensure that the freedoms of an individual are not unduly compromised by the processing of the data before considering whether our data requirements would be considered reasonable by a data subject in the processing of our service or supply.
How is it collected?	<ul> <li>We primarily collect information about you directly as part of the booking or ordering process.</li> <li>In some instances, data will be collected during the course and fulfilment of our duties as a sub-contractor.</li> <li>Our website uses cookies to better the experience for a user whilst visiting the website. Where applicable the website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / devices. Cookies are small files saved to the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website. Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.</li> <li>Our website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics. Further information about Google's privacy policy can be found at <a href="http://www.google.com/privacy.html">http://www.google.com/privacy.html</a>.</li> <li>Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.</li> <li>Once you have used these links to leave our site, you should note that we do not have any control over that other website and cannot be responsible for the protection and privacy of any such information that you share with that websit</li></ul>
What type of data is being collected?	We collect information about you such as your name, address, title, contact details, age, electronic identifiers and vehicle ownership details relative to us supplying a product or service. In the case of job applicants, CV and reference details relevant to the role you are

	We may also collect demographic data about you pertaining to any future interests or requirements you may advise us of about relative to our business or supply.
What happens if you fail to provide personal data?	Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to complete the product or service supply required. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.
How is my data be stored?	We retain your details for as long as we have evidence that you still own a vehicle or where we believe we may still have products and services that you would be interested in, unless you ask us to delete these details earlier. We store your data securely using suitable systems and processes. Our records are kept in a mixture of locations, on both internal and external platforms to maintain both the security and integrity of our data and all data access is controlled by secure access. Data flow charts are available on request. To prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. Some of the safeguards we use are: firewalls, data encryption, access and authorisation controls.
How will it be used?	<ul> <li>We use information collected from our website to personalise your repeat visits to our website.</li> <li>Information collected directly will be used to fulfil your orders or work requirements.</li> <li>Whether the information is collected online or directly, we will use it to provide products or services to you or maintain historical records, such as warranty claims.</li> <li>We may share your information outside of the group for compliance, fraud, regulatory reasons, processing fulfilment or if required to do so by law.</li> <li>In processing your order or request we may send your details to, and use information from, credit reference agencies and fraud prevention agencies.</li> <li>Information you supply may be used in many ways for audit and statistical analysis within the group.</li> </ul>
Future Marketing & Research	We would like to contact you in the future for service reminders, MOT reminders as well as for research about the work we have done. We would also like to contact you with information about our own products and services by post, telephone, email and SMS and social media. Please advise us of your preferences. You will always retain the right to opt out of any future marketing and research communications from us.
Social Media Platforms	Where we undertake social media marketing and advertising, it is important to be aware that some of our social media pages give us automatic access to some of your personal information that they store about you (for example, posts you have liked, adverts or content you have viewed). Communication, engagement and actions taken through external social media platforms are subject to the terms and conditions, as well as the privacy policies, held with each social media platform respectively. You control the personal information you allow us to have access to through the privacy settings on each of your applicable social media sites. Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution regarding their own privacy and personal details.
Who will it be shared with?	We may share your information with credit reference agencies and finance providers for use in credit decisions, fraud prevention as well as in the pursuit of debtors. We may share your information with product manufacturers for warranty claim purposes and to ensure the ongoing safety and care of your vehicle as well as to ensure any policies are maintained. We may share and cross check your information with DVLA. We may share your information with police authorities or another organisation legally able to request such information when an alleged motoring offence has taken place.

	We may share your information with sub- contractors or service providers to facilitate completion of a job, task or process.
	We may share your information with system providers to facilitate costing, procurement and service provision.
	We may share your information with Insurers to procure Insurance cover and products for you.
	Sharing information may enable us to help provide our services more efficiently and reduce the risk of us being unable to complete your order or request.
What will be the effect of this on the individuals concerned?	We will hold your information on file to enable us to maintain a transaction history for the purposes of audit and maintaining service level agreements with our work providers or trading associates. We will maintain your data for the minimum period required for regulatory compliance.
	The Manchett group of companies will not share your information for marketing purposes with companies outside of the group.
	Information passed to finance providers and credit agencies may be retained and kept for future use by other lenders in assessing applications from you and members of your household in the future. The information may also be held to prevent fraudulent activity.
Is the intended use likely to cause individuals to object or complain?	We do not anticipate that the nature of the data collected is likely to cause any individual to object or complain.
Your right to be forgotten	GDPR gives an individual the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances; -
	<ul> <li>where personal data is no longer necessary for the purpose which we originally collected or processed it for;</li> </ul>
	the individual objects to the processing of their data;
	<ul> <li>where your personal data is used for direct marketing purposes and you object to that processing;</li> </ul>
	where your data has been unlawfully processed.
	There are exemptions from the right to erasure. For instance, where there is an overriding legitimate interest to continue this processing, lawful requirement or for compliance with a legal obligation.
Access to your information and correction	You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information we hold please email <u>gdpr@manchetts.co.uk</u> or write to us at The Privacy Team, Manchetts, Ness Road Garage, Ness Road, Burwell, CB25 0AA.
	We want to ensure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.
	This privacy policy applies only to domains and software operated by the Manchett group of companies.
	From time to time we may update our privacy policy. The latest version of our policy can be found at <u>www.manchetts.co.uk</u>
Further guidance	If we are unable to resolve any issue you raise within 30 days you have the right to complain to the information commissioner's office @ <u>https://ico.org.uk/concerns</u> .