

RENAULT GDPR PROCESS GUIDE

<p>PROCESS</p>	<p>PLEASE NOTE: THIS INFORMATION IS PROVIDED FOR GUIDANCE PURPOSES ONLY AND DOES NOT CONSTITUTE LEGAL ADVICE. DEALERS WITH ANY CONCERNS SHOULD SEEK INDEPENDENT LEGAL ADVICE.</p>
<p>RENEWALS PROCESS – INCLUDING USE OF FISK</p>	<p>RCI are the data controller of data in FISC. For all contact with existing customers, the dealer will also be a data controller.</p> <p>As they're already a current customer, contacting them about a renewal may be considered as a 'legitimate interest', even if they haven't given marketing permission. However, you should not contact them with such marketing communications if the customer has opted out of communications.</p>
<p>EDR/WARRANTY</p>	<p>Dealers' privacy statements have to reflect the Renault privacy statement. This will say that customers' data will be shared with RENAULT UK LIMITED to help maintain accurate single customer view information, aftersales and warranty service records.</p> <p>Customer data from workshop invoices is passed to Renault as part of the EDR files, together with the channel communications flags and any stop communication flags. Renault treats these as dealer communication preferences, and an aftersales relationship will be created between the vehicle and the customer. Under the dealer agreement, dealers are required to share EDR data with Renault UK Limited.</p> <p>The customer will be matched to the RENAULT UK LIMITED's central customer database, and any updates will be shared with other central systems to help ensure the data we hold is accurate. RENAULT UK LIMITED will not use data in the EDR files for marketing purposes, but, for example, if a customer called customer relations, customer relations would be able to reference the customer's details.</p> <p>It's important to note that some DMS suppliers have made changes that will exclude complete EDR records from the EDR interface, if a customer has opted out of data sharing for marketing. However, it is important for Renault to receive this data, as required under the dealer agreement.</p> <p>This could affect dealers submitting warranty claims, so DMS parameter settings need to be reviewed carefully to reduce the risk of this happening.</p> <p>RENAULT UK LIMITED have made the DMS suppliers aware that this isn't satisfactory, and instead they should look to make the customer data elements of the interface anonymous and still send it.</p>

<p>iCRM – POLK INCLUDING TRANSFER OF CUSTOMER DATA FROM iCRM</p>	<p>The POLK interface is an IHS Markit interface, not a RENAULT UK LIMITED interface.</p> <p>The dealer is the data controller, passing customer data to POLK. POLK then becomes a data processor acting for the dealer.</p> <p>IHS Markit shares details of customers selected for service reminders and other campaigns with Renault fulfilment agencies.</p> <p>All dealers must implement the Renault data privacy policy statement, which covers that customer data is shared with RENAULT UK LIMITED and 3rd parties providing services to us.</p> <p>Where customers are already direct customers of the dealer, they can be sent direct marketing by the dealer without needing to rely on a specific marketing consent, by relying on legitimate interest and therefore a soft opt-in. This can apply where you have obtained the customer’s data whilst providing a service or purchase, and you have given the customer the opportunity to opt out of marketing communications. However, you can only send marketing communications regarding similar products and services as the original purchase/service. The communication should also give the customer the opportunity to opt out. Please note that if a customer has opted-out of marketing, you cannot rely on a soft opt-in, and you cannot send them marketing communications.</p> <p>For any new prospects, marketing consent is needed before including them in any aftersales marketing campaigns.</p>
<p>VEHICLE REGISTRATIONS</p>	<p>All dealers must implement the Renault data privacy policy statement, which clearly states that customer data is shared with RENAULT UK LIMITED for vehicle registration. This is considered as required for contractual purposes, and therefore consent isn’t needed.</p>
<p>SURVEYS</p>	<p>All dealers must implement the Renault data privacy policy statement, which clearly states that customer data is shared with RENAULT UK LIMITED under ‘legitimate interest’ for customer satisfaction surveys. Customers have the option to contact RENAULT UK LIMITED to opt out of this through the customer relations team.</p> <p>Dealers’ own surveys can also be considered as a ‘legitimate interest’ and do not need marketing consent. Although customers must clearly be able to opt out of this such communications too.</p>

<p>SALES ENQUIRIES AND FOLLOW UP ON LEADS RECEIVED FROM RENAULT UK LIMITED, RENAULT CENTRAL SOURCES AND DEALER DIRECT</p>	<p>The privacy notice that is displayed, or referred to, at all customer data collection points (including events), will tell customers that RENAULT UK LIMITED shares their data with dealers to process pre-sales enquiries.</p> <p>RENAULT UK LIMITED will also try to collect marketing consent that includes dealer permissions. If successful, this will also be supplied as part of the lead.</p> <p>If marketing consent is not given, RENAULT UK LIMITED and the dealer network can still legally process the customer’s data and respond to the lead under a contract legal basis.</p> <p>Should the dealer wish to include the customer in any future marketing activity, this can only be done if the customer has given marketing consent during the process of responding to the sales enquiry. Therefore, you can only contact them in relation to the lead enquiry, unless you have an opt-in from the customer for future marketing purposes.</p> <p>The process of customer leads being sent to dealers through the Renault Hub, and then for dealers to provide enquiry updates back to Renault, is allowed because there’s a contract in place between Contact Advantage and Renault.</p> <p>Dealers' privacy statements have to reflect the Renault data privacy policy statement and at the very least refer to the Renault UK Limited privacy statement at all data collection points. This will say that customers’ data will be shared with RENAULT UK LIMITED, including ‘walk in’ and other dealer-sourced sales enquiries.</p> <p>RENAULT UK LIMITED don’t currently use customer data from the Hub for any direct marketing purposes, the information though is important for targeting and measuring centrally funded digital marketing activities.</p>
<p>DEALER SYNDICATED MARKETING WITH ITG</p>	<p>The dealer is the data controller, passing customer data to ITG. ITG then becomes a data processor, acting for the dealer. As such, a data processing agreement between the dealer and ITG should be in place.</p> <p>For dealers’ direct customers, it’s possible to carry out direct marketing under a soft opt in under a legitimate interest legal basis if a specific marketing permission is not in place.</p> <p>For non-direct customers, or if the marketing is not for an existing vehicle or related product, then dealers will need to get marketing consent.</p> <p>Even on a ‘legitimate interest’ legal basis, it’s important that dealers offer a clear way for customers to opt out of marketing.</p>

<p>EASYLIFE PACK / 4+ / RENAULT AND DACIA EXTENDED WARRANTY AND SERVICE PLANS, AND MISSED FIRST SERVICE LISTS</p>	<p>Dealers can hold and process customer information under a contractual legal basis, without consent being needed. But this only covers communications to do with Renault manufacturer warranties or reminders of outstanding services where the customer has a Renault service plan.</p>
<p>HOW NPS SURVEY RESULTS CAN BE USED BY STAFF</p>	<p>Dealers are responsible for making sure that customers' data isn't shared with any third parties not clearly specified in their privacy notices.</p> <p>This includes not sharing customer details with anybody who walks into a dealership. So when it comes to things like printed customer survey responses on quality boards, the customer data should be made anonymous.</p> <p>However, using the first name and town only is acceptable. So 'John from Newcastle' is fine (used in much the same way as Reevoos would), but vehicle registration numbers, email addresses, phone numbers etc. is not allowed, as these could be used to identify John.</p>
<p>STORING AND PROTECTING CUSTOMER DATA WITHIN DEALER SYSTEMS</p>	<p>Dealers must make sure they have total control over who can access systems that hold customer data.</p> <p>Robust profile and user management is essential. Particularly making sure that employees' access is removed immediately when they leave the dealership. Renault UK service desk must also be informed so access to any Renault systems can also be revoked. This is especially important on any remote access internet facing systems. Only employees who need full access to customer data should be given such access. Additionally, dealers should have strict processes in place for data held on employee's personal devices.</p> <p>Customer data should be stored as encrypted data, ideally adhering to ISO27001 standards, or similar.</p>

<p>STORAGE AND SECURITY OF JOB CARDS AND VEHICLE SALES DEAL PACKS, WHICH WILL CONTAIN KEY CUSTOMER AND VEHICLE INFORMATION</p>	<p>Dealers are responsible for making sure that customers' data isn't shared with any parties not clearly specified in their privacy notices.</p> <p>This means any printed documents containing customer data shouldn't be left lying around, where they could be accessed by unauthorised people.</p> <p>Any paper documents containing customer data should be locked away overnight, and only kept for the minimum time required. If the data on paper documents needs to be kept, it should ideally be scanned electronically and the original shredded.</p>
<p>VIDEO VHC STORAGE AND SECURITY</p>	<p>Dealers are responsible for making sure that customers' data isn't shared with any parties not clearly specified in their privacy notices.</p> <p>Therefore, sharing videos on an open internet platform would potentially breach this if full customer details are referred to. This includes videos where things like registration numbers and customer names are shown. It's worth noting that some systems, (not CitNOW which has secure links), store the videos on YouTube and are not secure.</p>
<p>SHARING OF CUSTOMER INFORMATION WITH PAYMENT ASSIST AND OTHER PROVIDERS</p>	<p>When a customer takes service finance, the dealers' privacy statement should clearly state that data will be shared with a named finance supplier for this purpose.</p> <p>The legal basis for sharing this data though will be contractual, which means the customer won't have any right to object while the finance contract is in place, unless their data is used incorrectly,</p>
<p>COLLECTING CUSTOMER INFORMATION OFF SITE, LIKE AT SHOWS AND OTHER EVENTS</p>	<p>For dealer events run by agencies such as Fusion, the data collection iPad App will contain the standard Renault privacy policies and permission statements, including for marketing permission.</p> <p>If a customer's details have been collected at an event with marketing consent, then the dealer is free to market to them through the channels they've consented to. This can include marketing for any product the dealer chooses. Unless the customer has opted out.</p> <p>For customer data collected without marketing consent, unless marketing has specifically been objected to, the dealer will still be able to respond to a specific request, like arranging a test drive. If this applies to an existing customer, the dealer can send marketing to them for similar products, like a new vehicle.</p> <p>However, if an existing customer or new prospect has specifically opted out of marketing, then no marketing can be done, even under 'legitimate interest'.</p>

CUSTOMER DATA MANAGEMENT	DISCUSSION POINT
<p>WHAT DATA PRIVACY AND PERMISSION STATEMENTS SHOULD BE DISPLAYED?</p>	<p>It is important, both for dealers and RENAULT UK LIMITED, that our customer data has been collected under consistent privacy policy statements that has informed the customers of all the purposes we use their data for.</p> <p>Having some data that is ok for some purposes, and other data that is only ok for a subset becomes very complex to manage and increases the chances of either party using the data incorrectly, or, being constrained commercially unnecessarily.</p> <p>Renault has supplied a standard data privacy statement and permission statement text, which should be displayed and used at all points where customer data is collected. Please note that under the dealer agreement, Renault UK Limited has the right to share its suggested permission statement wording with dealers.</p> <p>Dealers may use their own privacy statement, but must make sure that it reflects the Renault data privacy policy, and that there are no inconsistencies between the two privacy statements</p>
<p>DATA RETENTION</p>	<p>Current Renault guidance says that prospect or pre-sales customer data should be retained for 3 years.</p> <p>For customers that have bought a vehicle, the guidance is 10 years or until 3 years after the vehicle has been sold. While information about the vehicle service history can be retained for 20 years.</p> <p>Dealers should refer to Renault UK Limited privacy policy statement for data retention guidance and contact us if you have any questions.</p>
<p>DATA PURGE AND RE-PERMISSIONING</p>	<p>Both RENAULT UK LIMITED and dealers have to make decisions about how much legacy customer data should be purged or deleted, and how much may need to be 're-permissioned'.</p> <p>Each dealer will have to make their own decisions on this, but a number of options are discussed below.</p>

<p>PURGE</p>	<p>RENAULT UK LIMITED have decided to keep the below data using the rules below to determine how much customer data should be retained:</p> <ul style="list-style-type: none"> • Current customer • Lapsed customers within the last 3 years – keep (but only for marketing with consent) • Prospect loaded in the last 3 years • Customers or prospects where marketing permission exists and they have opened and clicked on an email within the last 3 years <p>It is recommended that detailed counts of customer data totals within such segments are reviewed before final decisions are taken.</p> <p>(Please note that retained data may need to be re-permissioned and then may be deleted if consent isn't received – there's more on this later.)</p>
<p>INFORMING CUSTOMERS OF NEW PRIVACY POLICY</p>	<p>As all privacy statements will have changed, dealers should consider whether they need to inform current customers of the changes to the privacy statement, and send them a copy or link to it.</p> <p>This won't ask for any action or agreement, but increases awareness and helps protect everyone involved by letting customers know what we do with their data.</p>
<p>CUSTOMER DATA RE-PERMISSIONING</p>	<p>How much retained customer data dealers may need to re-permission depends on what privacy and permission statements were previously in place. And also how the data was collected, especially whether positive marketing consent was given.</p> <p>Some dealers may take a cautious approach and decide to re-permission all the customer and prospect data they hold. This has the advantage that the data of the customers that reply and give consent can then be used for a wider range of related products and, depending on permission statement wording, may cover sharing data with related companies for marketing.</p> <p>The risk is that the majority of customers are not likely to respond to a re-consent email so dealers are at risk of losing the ability to communicate with a majority of current customers, when continued communication under legitimate interest may have still been possible.</p> <p>A pragmatic approach could be to seek re-consent from prospects. Marketing to existing customers could therefore continue under 'legitimate interest', but with explicit processes in place to try and gather marketing consents the next time customers are contacted. With this approach, there must always be a clear opt out for customers.</p> <p>If a dealer is confident in their existing processes for collecting marketing consents, it may be that re-consent is not needed for all prospects.</p>