

# GDPR COMPANY POLICY, BEST PRACTICE & MISSION STATEMENT GDPR Overview & Mission Statement

"Our data records are our diamonds.

If mining diamonds, they must be coveted and looked after."

The Platinum Group is totally committed to complying with the GDPR (General Data Protection Regulation) legislation. This significant legislation is in force from 25<sup>th</sup> May 2018. It is our stated intention to keep all Employee and Customer Data safe, and to use/deploy it correctly and in accordance with the law at all times.

Put simply, the GDPR legislation concerns the security and correct use of data by and within an organisation. It will effectively superseded previous legislation surrounding data protection and related topics. This flagship legislation will be monitored by an oversight regulatory body (the ICO – Information Commissioner's Office), with businesses being subject to penalties and fines for instances of non-compliance.

Simple though that may sound, the legislation itself is wide ranging and complex and has ramifications for the work of all departments within the company going, whether HR, Marketing, Payroll, Sales, Service, Parts and Accounts/Finance etc. It must therefore be woven into the daily fabric and processes of the business.

Though the company provides this overall framework, it is teamwork that will ensure that we do this correctly each and every day. Thus GDPR compliance is a daily approach to working by which every team member must abide by, and maintain awareness of.

# **GDPR/Definition**

GDPR is the General Data Protection Regulation legislation that is in force from the 25<sup>th</sup> May 2018.

Put simply, the GDPR legislation concerns the security and correct use of data (in whatever form/s held) by and within an organisation. It effectively supersedes previous legislation surrounding data protection and related topics. This flagship legislation is monitored by an oversight regulatory body.

Simple though that may sound, the legislation is wide ranging and complex, with ramifications across all departments within the company – whether Sales, Service, Parts, Human Resources, Payroll, Marketing, Accounts/Finance and so on.

#### GDPR COMPANY POLICY & BEST PRACTICE

#### The Platinum GDPR Master Document

In order to overview, manage and monitor GDPR activities and compliance, the company will maintain ongoing a "Platinum GDPR Master Document".

This document will be updated when any GDPR Policy, Procedure, Process or Activity is changed or added. This will ensure that we have a single resource that overviews the Platinum Group's GDPR related compliance and activities.

# **Keeping Employee & Customer Data/Information Safe**

The Platinum Group is committed to keeping all Employee and Customer Data safe, and to use/deploy it correctly and in accordance with the law at all times.

#### **Data Mapping**

"Data Mapping" is basically a written description and understanding of how employee or customer data is used/deployed within a department, in collaboration with other departments and across the company in general (describing the processes and systems involved) in order to provide our services and in pursuit of the company's aims and obligations.

In order to prepare for the GDPR regulations, various team members will have been asked to provide "data maps" of their own departments. This may be asked of the management teams periodically in terms of reviewing "data maps" in order for the company to maintain a "current" version of data use, the processes involved and the systems utilised. This information will be kept within the GDPR Master Document.

#### IT Department

The IT Department has a crucial role to play in the safe and secure storage of both customer and employee data within the Platinum Group. The responsibilities of the IT department cover the following aspects within context of GDPR;

#### Virus Guards, Cyber Security, Firewalls

Ensuring that we have adequate and up to date virus guards, cyber security/firewall software at all times. This must be continually reviewed as threats change and become most sophisticated.

Should our security systems be breached, it must be reported immediately to the Board of Directors, where relevant action can be co-ordinated.

#### Scheduling of all Computers, Devices & Systems

It is the role of the IT Department to maintain a schedule of all computers, devices and systems in use within the group. This must be updated as and when new equipment is purchased and old equipment is retired.

#### Monitoring Loss/Theft of Computers, Mobile Devices & Phones

The IT Department must monitor the loss or theft of all computers, mobile devices and phones within the group, and ensure that processes exist for adding password protection, the ability to "wipe clean" a lost device, and back up for data recovery.

Should a computer, device or phone be lost, it must be reported to the IT Department for immediate action, and also to a member of the Board of Directors. The IT Department must keep a record of any items lost or stolen and notes as to what actions were taken.

#### - Back Up Of Data

The IT Department must ensure all data in use by the group is backed up in a safe and secure way, and that all team members are informed/shown how this works as required.

#### **Human Resources Department & Payroll**

It is the role of the HR & Payroll Department to work with other departments (especially IT) and the Board of Directors to ensure the safe confidential storage and deployment of Employee Data.

In a practical sense, this means in a digital realm the computing and systems utilised as well as tidy and confidential use of the HR office where files not being worked on are closed down (on computers) or put away securely (if paper).

It is also the role of all Directors and Managers to ensure the safe keeping of any HR/Payroll records that may be sent to them for whatever purpose.

#### Marketing

It is the role of the Marketing Department to ensure the confidential storage and correct use/deployment of all customer data at all times in accordance with GDPR regulations. This must be achieved in collaboration with the Board of Directors and the relevant departments within the company.

Though we believe the company has a "legitimate interest" to continue to contact and communicate with our active customer database, it is our intention to work towards achieving fully consented and preference based customer database.

The Marketing Department must ensure that marketing campaigns are only sent to those who consent to receive them, and ensure that records are accurately maintained and deployed to ensure this happens each and every time.

Should any security breaches become known, mistakes occur, or complaints received, it must be reported to the Board of Directors and the relevant department/s (such as IT if systems related). Also, the theft/loss of computers/devices must be reported to the Board of Directors and the IT Department.

#### Other "Central" Departments

Other "central" departments such as Group Accounts, Credit Control, Platinum Financial Solutions, Group Trade Parts and Transport must ensure the correct and confidential use of customer or employee data in accordance with GDPR principles – see IT, HR/Payroll & Marketing for reference.

Any instance of a data security breach such as the theft/loss of computers/devices must be reported to the Board of Directors and the IT Department.

#### **Branches of the Platinum Group**

All departments within branches of the Platinum Group must ensure the correct and confidential use of customer or employee data in accordance with GDPR principles – see IT, HR/Payroll & Marketing for reference.

Any instance of a data security breach such as the theft/loss of computers/devices must be reported to the Board of Directors and the IT Department.

#### Use of Data

In the Platinum Group, all Employee and Customer Data must be used/deployed according to GDPR principles without exception

#### **Data Collection**

When collecting Employee and Customer Data, it must be ensured that the Platinum Group receives consent and customer preferences for the use of that data in accordance with GDPR principles. This will generally be achieved by the Employee or Customer agreeing to the terms of our Privacy Policy.

#### Think Confidentiality

All team members must consider whether they ensure employee and customer data confidentiality at all times in performance of their duties/roles.

Examples to avoid include, but are not limited to;

- Leaving confidential information on a screen where others can view it
- Leaving confidential paperwork on a desk where others can read it
- Not having passwords on devices where others could look/gain access
- Discussing confidential information in a public area
- Working offsite (at home, en route to a meeting, in a coffee shop etc) where others may be able see or hear confidential information
- Putting confidential information in a rubbish bin where it can be seen by someone else

#### **Lock and Key**

Ensure all confidential information is stored securely under "lock and key" at all times.

#### Secure Areas - Intruders/Members of the Public

It is the duty of all Directors and Managers to ensure that confidential areas of the company (i.e. personal offices, accounts departments etc) are not visited by members of the general public (non employees/friends, family members, former employees, prospective employees unless accompanied).

# The Correct & Responsible Use of Data

#### - Employee Data

The Platinum Group is committed to the use/deployment of Employee Data in accordance with GDPR principles. Further detail can be found in other sections of the Company Policy and within the Privacy Policy.

#### - Customer Data

The Platinum Group is committed to the use/deployment of Customer Data in accordance with GDPR principles, which will be centred on a consent and preference based method to be achieved over a period of time. Further detail can be found in other sections of the Company Policy and within the Privacy Policy.

#### Keeping Records/Destroying Records

The Platinum Group will keep employee and customer data, but will not do so for any longer than is considered necessary, or we are legally obliged to do so.

# **Suppliers**

#### Choosing & Working With Reputable Suppliers

The Platinum Group will endeavour at all times to work with reputable suppliers in order to carry out our work.

An example would be choosing the supplier of a system which may hold or assist us in deploying Employee or Customer data. In this instance, we will take all reasonable steps to ensure GDPR credentials of a supplier and their products. We will ask where necessary for supporting information (such as their GDPR policies) as part of our diligence.

#### Existing Suppliers - Obtaining & Reviewing Supplier Letters & Policies

For existing suppliers, the Platinum Group will collate their GDPR credentials and policies, and assess their ongoing suitability as a partner/supplier. This may be done periodically going forwards/as required

#### New Suppliers – Obtaining GDPR Credentials/Policies

We will take all reasonable steps to ensure the GDPR credentials of any new supplier and their products. We will ask where necessary for supporting information (such as their GDPR policies) as part of our diligence.

#### Central Filing of GDPR Supplier Information – Letters, Policies and Contracts

The Platinum Group will ensure the central filing of all GDPR related suppliers – in terms of letters, contracts, policies etc.

Any Director or Manager tasked with obtaining a "GDPR Related" product or service must ensure the central storage of these files at Head Office

#### **GDPR Best Practice**

GDPR Best Practice will be a continual "work in progress". Here are some example items to consider;

- Ensure Computer screens are shielded or software minimised/closed if leaving your desk
- Take steps to ensure "Remote Working" retains confidentiality and minimises risk
- Report Lost Computers, Phones & Mobile Devices immediately
- Protecting Confidentiality by keeping a tidy desk, tidy computer and "lock and key" policy
- Ensure that Used Cars & Demonstrators when prepared for sale are checked for the previous drivers information check (glovebox, owners manual pack)
- Sat Navs & Onboard Computers are cleared of information the previous drivers journeys and route plans
- Ensure all paper records & archival materials are securely stored under lock and key
- Ensure that confidential information that is no longer required are shredded rather than thrown in a bin or skip

#### Platinum "Big Clean-up"

From time to time, the Platinum Group may instigate a "Big Clean-up" at the sites which will include items within our GDPR Policy.

### **Communicating GDPR**

The Platinum Group will communicate it's GDPR related policies, guidance and directives in the following ways;

#### - Employee Booklet

A concise GDPR guide will be issued to existing employees, and new employees (usually in their induction)

#### - Job Application Forms

The Platinum Group will gather knowledge of an applicant's GDPR awareness/previous experience/training on the Job Application Form.

#### Company Policy

The current version of the Platinum Group's GDPR policy will be held on the company's intranet Platinum Info Central. This will be updated as required.

It will also be held within the GDPR Master Document.

#### Privacy Policy

The Platinum Group's GDPR/Privacy Policy information will be held on the company's intranet Platinum Info Central, the various websites run by the group and other digital platforms as required. This will be updated as required.

It will also be held within the GDPR Master Document.

#### - GDPR Master Document

Excerpts of the GDPR Master Document will be used in group communications as required.

#### - Management Meetings & Reviews

GDPR will be an ongoing topic within Management Meetings and Reviews.

#### Dedicated GDPR Meetings

The Platinum Group will convene meetings dedicated to GDPR or aspects of it, with actions to follow arsing and communicated.

#### - Memos & Staff Communications

The Platinum Group will communicate GDPR requests and actions required via memos as required.

#### - GDPR Audits

The Platinum Group will conduct GDPR focused audit periodically to check compliance.

# **Updating Records**

#### - Employee Records

The Platinum Group encourages employees to keep their personnel records up to date.

The relevant forms can be downloaded from the company Intranet, Platinum Info Central. For extra assistance, please contact the HR Department at Head Office.

#### Customer Records

It is in everyone's interest that customer records are kept up to date as much as is realistically possible.

Please ensure that customer records are checked/verified at each customer touchpoint/interaction.

It is also important that customers can change their preferences should they wish to do so, which can be completed online by visiting the Platinum Motor Group website.

We will only keep customer records for as long as we deem it necessary to do so and/or obliged to do by law.

# **Information Request**

Employees and Customers have rights to request information that we hold about them in the form of an Information Request.

Should we agree that the request is reasonable and in accordance with GDPR, we will provide it within 30 days of receipt of the request.

COMPANY POLICY & BEST PRACTICE UPDATED - 2<sup>nd</sup> May 2018

#### PRIVACY POLICY

In terms of our employees and customers, the Platinum Group has a comprehensive Privacy Policy that sets out the company terms and conditions in relation data use and data protection/security in relation to GDPR.

This Privacy Policy will be reviewed periodically and may be updated/superseded should the company deem it necessary or appropriate to do so. It will be available to view within this Company Policy (see below) and also on sections of the company intranet Platinum Info Central and on public websites/digital platforms used by the group.

#### GDPR PRIVACY POLICY - Short Version

# HOW THE PLATINUM MOTOR GROUP USE YOUR DATA TO ENSURE YOUR MOTORING IS SAFE, ENJOYABLE, EASY AND EXCELLENT VALUE – AN OVERVIEW

The Platinum Motor Group (Renrod Ltd) believes in being transparent and open with you, our valued customer. Recently, we have updated our privacy policy, which overviews and explains how we manage your information, how it is shared, and why it is important to both you as our customer and ourselves as the supplier of your motoring needs.

Put simply, the Platinum Motor Group will tell you how we use your data, and will use it in a responsible way to ensure that your motoring is safe, enjoyable, easy and excellent value.

We will also ensure that we treat all customer data with the importance it deserves, in both the way we collect and store your data.

#### SAFE MOTORING WITH THE PLATINUM MOTOR GROUP

In order for the Platinum Motor Group to communicate with you in a relevant, useful, clear, professional and coherent way, we have to collect and store a modest amount of data about you, like your name, email address, postal address and mobile phone.

In order to ensure that we can serve you in the best way possible, we also have to share your data with our trusted partners as and when required – such as the manufacturer of your vehicle, finance companies and the providers of the systems that we utilise in order to perform our work for you.

The Platinum Motor Group will always manage your personal data in a responsible way by collecting, handling and storing your data in a professional and secure environment.

Additionally, we will always seek to ensure that we work with other businesses that share the same ethic and view the protection of customer data as paramount.

#### EASY COMMUNICATION FROM THE PLATINUM MOTOR GROUP

It is the aim of the Platinum Motor Group to ensure our communication with you is relevant, informative, responsible and proportionate. As examples, we will utilise your contact details to inform you of relevant offers, product upgrades/recalls (including safety related items), scheduled servicing requirements, MOT Test reminders and other useful communications.

We may also send you surveys, which we will use to improve and refine our customer experience where necessary, based on your feedback.

#### AFFORDABLE MOTORING FROM THE PLATINUM MOTOR GROUP

It is the intention of the Platinum Group to move towards a fully consented and preference based customer database which we will endeavour to update by ongoing customer contact and by actions conducted by the Marketing Department (such as surveys/invitations to update records).

From time to time, we will send you details of offers and promotions that you may find useful and informative.

By choosing to receive email marketing from the Platinum Motor Group, we can communicate many products and services that may be of interest to you. We will always be responsible in our marketing communications with you, and ensure that it is relevant and proportionate.

#### YOU'RE IN THE DRIVING SEAT

It's important to remember that you're in control (in the "driving seat", if you will) and have the option to manage your preferences at any time.

If you wish to amend the information we hold, please contact us so that we can make any necessary changes to our records.

Plus, we'll always get your permission before we use your data for marketing.

#### **GDPR PRIVACY POLICY – Full Version**

#### OUR USE OF YOUR PERSONAL DATA - THE PLATINUM MOTOR GROUP'S PRIVACY POLICY

At the Platinum Motor Group (Renrod Ltd), we understand that privacy and the security of your personal information is extremely important. Our Privacy Policy applies to the personal data that we collect and use.

This policy sets out what we do with your information and what we do to keep it secure. It also explains where and how we collect your personal information, as well as your rights over any personal information we hold about you.

This policy applies to you if you enquire and interact with our businesses, and subsequently purchase or use our products or services in whatever capacity, over the phone, in print, online, through our mobile applications or otherwise by using any of our websites, interacting with us on social media or by other methods.

Information that you provide to us may include but not be limited to your name, address, date of birth, telephone number, email address, bank account and payment card details and any feedback you give to us, including by phone, email, post, or when you communicate with us via social media.

It may include information about the Services that we provide to you (including for example, the things we have provided to you, when and where, what you paid, the way you use our products and Services, and so on).

When reviewing your application for financial products and services that we offer (for example, insurance products and finance plans) we will take into account other information about you such as your employment details, financial position, information taken from identification documents such as your passport or driving licence, your insurance, criminal and medical history, and details about additional insured parties and cardholders or joint policyholders.

The Platinum Motor Group (Renrod Ltd) uses your personal data for the following purposes:

# TO MANAGE YOUR ENQUIRIES, BOOKINGS AND TO ALLOW US TO PROVIDE OUR SERVICES (SOME ESSENTIAL AND SAFETY/LEGAL RELATED) TO YOU

When you choose to do business with us, we use your information to perform our services in relation to enquiries, bookings and to allow us to provide our services related to and essential to the running of your vehicle (some essential and/or legal in nature).

We also use it to contact you in the event of necessary changes of bookings and arrangements that we have with you, should you request such changes or we need to re-arrange.

In addition, we also use your information in relation to your visits to our dealership/s, such as when you bring your vehicle to us for scheduled servicing whereby we can quickly retrieve your data in order to ensure a straightforward and efficient visit for you.

#### FOR COMMUNICATION AND RELATIONSHIP MANAGEMENT

In order to communicate in a clear, professional and efficient manner, we may need to contact you by letter, email, SMS or telephone for administrative or operational reasons,

For example, we may send you confirmation of any bookings or arrangements that we have with you, or to notify you when changes are necessary to the original arrangements that we have in place.

If you are using our mobile app, we may also send you app notifications for these purposes.

The communications described above are not made for marketing purposes and as such, you will continue to receive them even if you decide to opt-out from receiving marketing communications.

We will also use your personal data if we contact you after you have sent us a request, filled in a online form through our website or contacted us on social media.

In terms of your customer experience in enquiring with us and choosing to do business with us, we may send you a letter, email, SMS or telephone you to seek your feedback. Your opinion as a client is vitally important to us, with any communications you exchange with us and the feedback you provide being utilised help us to improve our services and experiences for customers in the future.

#### TO PROVIDE A PERSONALISED CUSTOMER SERVICE AND COMMUNICATION CHANNEL

We may use your personal data in order to tailor our services to your needs and preferences and to provide you with a personalised customer experience.

For example, if you inform us about your preferred dates for a test drive or service booking, we can use that information to ensure a convenient time is booked for you.

We may also collect information on how you use our website, which pages of our website you visit most, which flights you search for and what products you buy, in order to understand what you like.

We may use this information to tailor the content and offers that you see on our website and, if you have agreed to receiving marketing communications, to send you relevant messages that we think you like.

#### TO COMMUNICATE NEWS & OFFERS THAT YOU MAY FIND USEFUL AND CAN BENEFIT FROM

We would like to tell you about the great offers, ideas, products and services offered by the Platinum Motor Group. Therefore at times, we may send you marketing communications. As we move towards achieving a fully consented and preference based customer database, this will only occur if you have indicated that you are happy to receive these, for example when you make an enquiry on our website or make a booking with us and you do not express a wish to not receive such communications. We won't send you marketing messages if you tell us not to but we will still need to send you occasional service-related messages of a legal or safety related nature.

If you are happy to receive marketing communications, we will provide you with relevant and informative news from us such as new product upgrades/launches or offers that we believe you may find interesting and attractive. Such offers may include information about loyalty offers, sale events, current offers, introductory offers, limited period discounts and deals, financing options and related products, servicing offers, MOT's, repairs, service plans, parts and accessories and any other related products or services that are relevant to our relationship you. The majority of the information relating to news and offers are available to view on our website/s.

In addition, we may send you communications promoting the products and services of selected partners that you might also find useful. In this instance, we do not share your contact details and other personal data with other companies for marketing purposes, unless we have obtained your consent to do so.

Should you not wish to receive marketing communications from us, you can inform us in a number of ways, such as when completing an online enquiry form or visiting an "update your records" page on our website/s. Alternatively, you can contact a member our teams to inform us of your intention. If you prefer, you can also send an email to <a href="mailto:data.protection@platinummg.co.uk">data.protection@platinummg.co.uk</a>

Opting out of receiving marketing communications can be done at any time, as well as activating a request to receive marketing.

#### TO FULLFIL OUR ADMINISTRATIVE AND BUSINESS OBLIGATIONS

The administrative purposes for which we will use your information include accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, statistical and marketing analysis, systems testing, maintenance and development.

#### TO ENSURE FINANCIAL RESPONSIBILITY

When you apply to us to open an account, we will conduct necessary checks including our own records, request any further information that we need and search credit ratings agencies as required.

If you give us false or inaccurate information and we suspect fraud, we will record this and may also pass this information to financial and other organisations involved in fraud prevention to protect us, them and our respective customers from theft and fraud.

If you are applying for an insurance based products, we will share your details with our chosen supplier/s of insurance products for them to process your application and, if appropriate, offer you an insurance product. The insurers may hold your information for a reasonable period for record keeping purposes, and may be required to share your information either where required by law, with regulators or statutory bodies or with third parties where you have been notified or it is obvious that they will do so.

If you apply for any of our credit-based products such as a finance plan, we will perform searches with credit reference agencies. We may give details of your application to credit reference agencies. If you borrow and do not repay in full and on time, we may inform credit reference agencies who will record the outstanding debt.

#### TO BE LEGAL AT ALL TIMES

We will use your data in relation to legal obligations with which our business must comply. An example is our obligation to provide your information to DVLA when registering a new vehicle.

We may transfer your personal information to other organisations in certain scenarios. For example:

If we're discussing selling or transferring part or all of a business, we may share information about you to prospective purchasers - but only so they can evaluate that business. If we are reorganised or sold to another organisation, we may transfer information we hold about you to them so they can continue to provide the Services to you.

If required to by law, under any code of practice by which we are bound or we are asked to do so by a public or regulatory authority such as the Police or the Department for Work and Pensions, or if we need to do so in order to exercise or protect our legal rights, users, systems and Services. Additional, in response to requests from individuals (or their representatives) seeking to protect their legal rights or the rights of others.

#### **SHARING YOUR PERSONAL DATA**

We may share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- Government authorities, law enforcement bodies and regulators
- The relevant vehicle manufacturer relating to your vehicle ownership
- Suppliers providing services to us in order to help us run our business

The Platinum Motor Group very carefully chooses the suppliers who process or whose products store/process your personal data on our behalf and require that they comply with high security standards for the protection of your personal data.

Credit and debit card companies

The Platinum Motor Group shares some of your personal data, which includes information about your method of payment, to the credit or debit card company that issued the card you used to make your payment. In order to ensure the security of your transactions and prevent or detect fraudulent transactions, we may also share your information with our fraud screening partner.

 Our partners who offer other products and services, promote offers or co-organise competitions with us, social media platforms and links to external websites

We work with partners, suppliers, insurers and agencies so they can process your personal information on our behalf. We only share information that allows them to provide their services to us or to facilitate them providing their services to you.

From time to time, we make certain third party offers available through our website or we publish competitions co-organised by third parties. If you choose to purchase products or services offered on our websites by third parties accept offers or participate in a competition, some of your personal data, such as your contact details and your billing information, may be directly collected by or disclosed to that third party.

Our partners have their own privacy policies and terms of use over which Platinum Motor Group does not have control. Whilst we carefully selects these partners, it has no responsibility or liability for their privacy policies, terms of use or the way they process your personal data. Please ensure that you review the relevant privacy policies and terms of use of these partners prior to purchasing their goods or services, using their websites, apps or services or providing any personal data to them.

We sometimes provide you with links to other websites, but these websites are not under our control. Therefore we will not be liable to you for any issues arising in connection with their use of your information, the website content or the services offered to you by these websites. We advise you to consult the privacy policy and terms and conditions on each website to see how each supplier may process your information.

When using one of our websites or mobile applications, you may be able to share information through social networks like Facebook and Twitter such as when you 'like', 'share' or review our Services. When doing this your personal information may be visible to the providers of those social networks, their other users and/or the Platinum Motor Group. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

Your personal data may be shared with other divisions or departments within our Group. It may also be disclosed to a third party who acquires us. It also includes any other businesses we add to this group in the future.

#### **COOKIES OR OTHER TRACKING TECHNOLOGIES**

We may use technologies, such as cookies and other tracking software In order to deliver customer care, and to provide you with more relevant content. This is achieved by analysing how visitors use our websites and apps. In the majority of instances, we will not be able to identify you from the information we collect using these technologies.

For example, software that studies customer traffic patterns and website usage can assist us in improving our web based platforms website and thus improve the customer experience. In addition, in order to understand how our customers interact with the emails and the content that we send, we use software that allow us to know if the emails we send are opened or if the content of our emails is displayed in text or html form.

We also use cookies in our website, mobile app or in our emails. Cookies are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on our websites or apps and allow us to provide features such as remembering aspects of your last page visits, making future searches faster. You can delete cookies if you wish; while certain cookies are necessary for viewing and navigating on our websites or app, most of the features will be still accessible without cookies.

For more information on how we use cookies and how you can remove them, read our Cookie Policy.

#### **REQUESTING ACCESS TO YOUR PERSONAL DATA**

You have a right to request access to the personal data that we hold about you.

This is sometimes called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge.

Before providing personal information to you or another person on your behalf, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.

If you would like to request a copy of your personal data, please visit our website for more information.

### THE SECURITY OF YOUR PERSONAL DATA

The Platinum Motor Group (Renrod Ltd) committed to ensuring the security of all customer and employee data records in whatever format it is kept.

We will take all appropriate measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.

As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where the Platinum Motor Group discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data; however in some instances we may be compelled by law to disclose your personal data to a third party, and have limited control over how it is protected by that party.

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party. We may also allow access to your information by other third parties who act for us for the purposes described in this Privacy Policy or for other purposes approved by you.

We will retain your personal data for as long as we need it in order to fulfil our purposes set out in this Privacy Policy or in order to comply with the law.

#### HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

We will retain a record of your personal information. This is done in order to provide you with a high quality and consistent service across our group. We will always retain your personal information in accordance with law and regulation and never retain your information for longer than is necessary.

#### **UPDATES TO THE PLATINUM MOTOR GROUP'S PRIVACY POLICY**

We may make changes to this Privacy Policy from time to time, including as part of the new European data protection legislation which will apply from the 25 May 2018 onwards (known as GDPR – the General Data Protection Regulation). If required, we will update our Privacy Policy and will publish on our website any new version of this Policy.

#### **COMPANY INFORMATION**

Platinum Motor Group is a trading name of Renrod Limited. Registered Office, Platinum Motor Group, Unit 12 Meridian Business Park, North Bradley, Trowbridge. BA14 0BJ. Registered in England No. 1210595. VAT Registration No. 821 9379 14. Renrod Limited Trading as Platinum Motor Group is authorised and regulated by the Financial Conduct Authority for consumer credit activity. Registration No. 689306. Renrod Limited Trading as Platinum Motor Group is permitted to advise and arrange general insurance contracts as an appointed representative of AutoProtect (MBI) Limited which is authorised and regulated by the Financial Conduct Authority. Registration No. 312143

PRIVACY POLICY UPDATED – 2<sup>nd</sup> May 2018