

How do we process personal data?

The purpose of this document is to identify each of the ways in which we process our customers' personal data and the legal basis we rely on to do so. This information will be provided to customers (via our privacy policy) and will enable Inchcape to put in place the appropriate policies and procedures.

Making a vehicle enquiry or negotiating to buy a vehicle		
Processing Activity	Type of data	Legal basis
In line with FCA guidance, we will record information indicative of potential vulnerabilities. This is to ensure that we can support you with any additional needs you may have. Click here to read the FCA's guidance for firms on the fair treatment of vulnerable customers.	Contact data / Identity data / data relating to vulnerability	Legitimate interest
To respond to your enquiries and to fulfil your requests - for example to send you a brochure or to provide details about a vehicle.	Contact data / Audio data	Contractual performance / Legitimate interest
To email you a video presentation about a vehicle you have enquired about.	Contact data	Contractual performance / Legitimate interest
To follow up on a request you have made through a third party website – such as Autotrader to enquire about a vehicle we have advertised.	Contact data	Legitimate interest
To arrange a test drive where we have a legal obligation to check you hold a valid driving licence and for insurance purposes and compliance with the Road Traffic Act.	Contract data / Identity data	Contractual performance / Legal or regulatory obligation
Photographic images and footage of you is collected via the operation of CCTV when you come into our showrooms or visit our dealerships. This is for security, crime prevention and required for insurance purposes. We may also, on occasion, undertake video and audio recordings of mystery shopper exercises at our sites. These recordings are made to ensure our employees are providing excellent service to customers. Whilst customers are not the intended subject of these recordings, it is possible that customer images may be captured during this process.	Image data	Legitimate interest
Purchasing a vehicle		
Processing Activity	Type of data	Legal basis
Completion of all mandatory sales documentation to purchase a vehicle, including Motability sales and sales of VAT zero rated vehicles.	Contact data / Identity data / Vehicle data / Transaction data / Family data if applicable/health data where necessary	Contractual performance and where health data is required, substantial public interest

To prevent illegitimate reselling or exporting of vehicles outside of the manufacturers guidelines and to ensure we comply with Inchcape's contractual obligations.	Contract data/Identity data/vehicle data/transaction data	Contractual performance
Sharing your personal data with vehicle manufacturer systems to allow vehicle ordering, in car systems setup, and activation of services and products for the vehicle including warranty.	Contact data / Vehicle data / Family data if applicable	Contractual performance
Administer the manufacturer's complimentary insurance on your behalf (if applicable).	Contact data / Family data if applicable	Contractual performance / Legal or regulatory obligation
Registering and taxing the vehicle with the DVLA.	Contact data / Vehicle data	Contractual performance / Legal or regulatory obligation
To provide or manage any information, products or services you have asked for specifically related to the purchase of your vehicle - for example the purchase of an asset protection policy or cosmetic repair product.	Contact data	Contractual performance / Consent
If you are part exchanging or selling your vehicle to our dealership we will check your vehicle details via our third party provider CAP-HPI before making an offer to buy the vehicle and may use an appraisal tool provided by BCA.	Vehicle data	Contractual performance / Legal or regulatory obligation
To send you a customer survey following your vehicle purchase to gain your feedback about our products and services provided.	Contact data	Legitimate Interest

Purchasing a vehicle with Finance

Processing Activity	Type of data	Legal basis
To administer and arrange finance for you to purchase or lease a vehicle.	Contact data / Vehicle data / Identity data / Financial data	Legal or regulatory obligation / Legitimate interest
Completion of documents required to comply with the FCA guidelines when administering finance on your behalf.	Contact data / Vehicle data / Identity data / Financial data	Legal or regulatory obligation
To enter your personal details into the finance provider's system so the finance provider can conduct a credit check and affordability assessment on you before making a decision whether to offer you finance to fund your vehicle.	Contact data / Vehicle data / Identity data / Financial data	Contractual performance / Consent
If your application for finance is declined by the finance provider, we will advise you of this before sending your personal information to another lender for consideration. We will always seek your consent before passing your application to other approved finance providers or credit brokers.	Contact data / Vehicle data / Identity data / Financial data	Consent
To contact you where you may be suitable to purchase a subsequent vehicle with finance, for a contract renewal, at the	Contact data /	Legitimate Interest

end of your contract or in relation to the purchase of a new vehicle.	Vehicle data / Identity data / Financial data	
Vehicle maintenance, repairs and servicing		
Processing Activity	Type of data	Legal basis
To contact you to book an appointment to bring your vehicle into the dealership which falls under your service contract or service plan for your vehicle.	Contact data / Vehicle data / Audio data	Contractual performance
To register your vehicle with service plans administered by the vehicle manufacturer or a third party provider.	Contact data / Vehicle data / Audio data	Contractual performance
To collect or deliver your vehicle outside our dealership for example to collect your vehicle from your home or work address to undertake service works on the vehicle. This service maybe outsourced to an approved third party vehicle delivery company.	Contact data / Vehicle data	Contractual performance
Arranging a courtesy car. If we agree to provide a courtesy vehicle to you for the duration of the works on your vehicle you will be asked to provide a copy of your driving licence for insurance purposes and to ensure you hold a valid driving licence. If you incur any speeding, parking or other motoring offences when using the vehicle, we will forward your contact data to the third party enforcing the penalties.	Contact data / Vehicle data / Identity data	Contractual performance / legal or regulatory obligation
We will contact you in relation to all on-going servicing, repairs and maintenance of your vehicle, including manufacturer warranty claims.	Contact data / Vehicle data / Audio data	Contractual performance / Legitimate interest
Rectification works to your vehicle as part of an insurance claim. Your insurance provider may request your vehicle is repaired by one of our approved body shops and they will share your personal information with Inchcape for this purpose.	Contact data / Vehicle data	Contractual performance / Legitimate interest
We may capture your vehicle registration number when you drive onto our dealership premises using ANPR to recognise you in relation to your service booking.	Contact data / Vehicle data / Image data	Contractual performance / Legitimate interest
Breakdown assistance, your personal details are provided by the breakdown provider to Inchcape to complete the repairs.	Contact data / Vehicle data	Contractual performance / Legitimate interest
We will contact you to notify you when your vehicle is due for servicing or MOT as part of our ongoing service to you. The legal responsibility for maintaining the vehicle in line with the manufacturer's guidelines is with you.	Contact data	Legitimate interest
To contact you if there is a safety or product recall notice issued by the manufacturer to arrange rectification works at our authorised dealership.	Contact data / Vehicle data	Vital interest
We may contact you with other communications relating to manufacturer recommendation for maintenance of your vehicle, vehicle health checks or other similar services.	Contact data / Vehicle data	Legitimate interest

Processing necessary for us to promote our business and engage with our customers		
Processing Activity	Type of data	Legal basis
If you are an existing or new customer to Inchcape we will send you promotional marketing information including invitations to events in our dealerships and offers from time to time if you have purchased a product or service from us. You have the right to object to us sending you this information at any time. Please see section 11 in this privacy notice for further detail about your rights.	Contact data	Consent
If you do not have a previous relationship with Inchcape or have never negotiated to buy a vehicle or purchased any of our products or services we will only send you marketing communications if you have opted in to receive these communications.	Contact data	Consent
To contact you with targeted advertising delivered online through social media and other platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us.	Social Network data / Website data	Legitimate interest
To identify and record when you have received, opened or engaged with our website or electronic communications.	Contact data / Social Network data / Website data	Legitimate interest
To contact you in relation to additional products and services, including those offered by third parties, that may be related to your vehicle such as asset protection and extended warranty protection plans.	Contract data / vehicle data	Legitimate interest
To administer competitions and promotions that you enter with us from time to time and to distribute prizes.	Contact data	Consent
To undertake market analysis, focus groups and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services that we think you will be interested in. Focus groups held at our sites may be subject to audio and video recording.	Contact data / opinions / image and audio data for focus groups	Legitimate interest
To work with third parties that help us with our advertising and marketing to help us understand how well our advertising work and to reach people who may be interested in our products and services.	Contract data / vehicle data	Legitimate interest
We may take photographic images of you when you collect your new vehicle from the dealership or record video footage during dealership events with your consent to promote our business via social media channels or via our websites.	Image data	Consent

Processing necessary for our business to operate on a daily basis and to fulfil data protection laws

Processing Activity	Type of data	Legal basis
For general administration including managing your queries, complaints, or claims and liaising with our advisors and industry associations for the resolution of your complaints or claims.	Contact data	Contractual performance/ Legitimate interest
Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively.	Contact data	Contractual performance
For network and information security purposes i.e. in order for us to take steps to protect your personal data against loss, damage, theft or unauthorised access.	Contact data	Legal or regulatory obligation
To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request).	All types of data Depending on the request	Legal or regulatory obligation
To inform you of updates to our terms and conditions and policies.	Contact data	Legal or regulatory Obligation
To inform you of changes to our business, for example the opening, closing or rebranding of dealership sites.	Contact Data	Legitimate interest