

SNOWS LIMITED - PRIVACY POLICY, NOVEMBER 2022

1. General intro

1.1. We are committed to ensuring that we manage your personal data professionally and in compliance with all applicable data protection laws. Part of this commitment is to ensure that there is transparency about how we process personal data. This policy includes an explanation of:

1.1.1. what data we are processing;

1.1.2. why we are processing it and what we do with it;

1.1.3. whether we will share it with anyone else;

1.1.4. whether we will transfer it outside of the United Kingdom;

1.1.5. how we keep your data safe; and

1.1.6. your rights.

1.2. We hope that you find this Privacy Policy helpful. If you have any questions, please don't hesitate to contact us.

2. About us

2.1. Our company name is Snows Motor Group Limited, and we are located at Snows House, Second Avenue, Millbrook, Southampton, Hampshire, SO15 0BT. In this policy, we have referred to Snows Motor Group Limited as: we, us, our or Snows.

2.2. Snows is an authorised retailer for: Abarth, Alfa Romeo, BMW, CUPRA, Fiat, Jeep, Kia, Lexus, Mazda, Mercedes-Benz Vans, MINI, Peugeot, SEAT, Toyota, Volkswagen Commercials and Volvo. A full list of our retail locations and our trading titles is available on our website: www.snows.co.uk.

2.3. Our website is powered by Automotive Transformation Group Limited ("ATG"), our third-party web services provider. ATG is committed to ensuring that data is processed in accordance with applicable data privacy laws, and is kept secure. ATG is certified to the standard of ISO27001:2013 (an international standard for information security). ATG uses Amazon Web Services, Inc. as its cloud platform provider. All data processed by ATG is stored on Amazon's web servers in the EEA.

ATG's wholly owned subsidiaries, GForces Web Management FZ LLC (UAE) and GForces Vietnam Web Management Company Limited (Vietnam) provide various support and development services for ATG. In order to provide those services, it is sometimes necessary for the subsidiaries to access the personal data collected by ATG as outlined below, as well as personal data collected on behalf of our customers through the provision of our software services. When our subsidiaries access personal data, it never leaves the EEA as part of the process. The data is accessed and processed via secure VPN access points. ATG ensures that adequate safeguards are in place.

2.4. For any queries concerning your data and this policy, please contact the Customer Experience Manager, at the above address or by email at customerservices@snows.co.uk or by phone on 02380 707750.

3. Your personal data

3.1. We process your personal data if we understand that you may be interested in purchasing our products or services. In this section we provide more detailed information about how we will manage your personal data.

3.2. What data do we hold about you and how have we obtained this?

3.2.1. We will obtain information about you when you enquire about our products or services. Typically, the information that we obtain will be your contact details and payment information. If you choose to buy finance or insurance products from us or from companies that partner with us, we will need more detailed information including, in some cases, identity and personal financial information.

3.2.2. If you are part exchanging or selling your vehicle to us, we will check your vehicle details via third party providers. These checks include vehicle mileage, condition, outstanding finance and history.

3.2.3. If you have visited our website, ATG collects standard internet log information (your IP address, browser, and type of device) and details of visitor behaviour patterns (where you joined our site from, the path you take through our site and where you leave). These are stored against unique ids (which are strings of numbers). ATG collects this information for the legitimate business purpose of monitoring the number of visitors to the various parts of the site, the general geographic location of visitors and engagement levels, which in turn enables it to make improvements to its websites and services, and provide business intelligence. ATG also processes the information for the legitimate business purposes of maintaining cybersecurity and business continuity. This information is only processed in a way which does not identify anyone. It is kept indefinitely. We collect some of this information using cookies – please see Cookies in section 5 for further information. We may also collect

any personal information which you allow to be shared that is part of your public profile on a third party social network.

3.2.4. When you submit information using an online form, ATG processes the data collected and stores it for 31 days for the legitimate business purpose of enabling us to access the information and deal with your request (it is then kept for a further 14 days in ATG' routine back-ups for business continuity purposes). This information is also processed by Keyloop Holdings (UK) Limited (RapidRTC) who provide our Customer Relationship Management (CRM) software.

If you enter your post code, GForces stores the first part of it (e.g. 'ME14' or 'SW1') and links it to standard internet log information already collected (it is used for the same purposes as that information, as outlined above).

Please see Keyloop's [privacy policy](#) for more information on how they use your data.

3.2.5. Our telephone calls may be recorded for training purposes and may also be used to verify any comments that were made during any conversation. Click here to read our [Call Recording Policy](#)

3.2.6. We use a third-party provider, Gubagoo Inc. to supply and support our LiveChat service. If you use the LiveChat service we will collect your name and email address if you provide this and any other personal information that you volunteer to us. This is used for the legitimate business purpose of handling customer enquiries in real time and then following up. This data is stored by Gubagoo for 6 months to enable us to access the information and deal with your enquiry. Gubagoo stores the information in the US under Standard Contractual Clauses which provide appropriate safeguards. Please see Gubagoo's [privacy policy](#) for more information on how they use your data.

3.2.7. We have CCTV in operation at each of our operations for security purposes. It is therefore possible that images of you will be recorded when visiting our sites.

3.2.8. Sometimes you will have sent your information directly to us, but you may have provided your information a third party who, in turn, has provided the information to us.

3.3. Your data that we process with your consent?

3.3.1. For new customers who have purchased goods or services from us on or since 25th May 2018 and who have **consented**, we:

3.3.1.1. will provide you with marketing information beyond your initial enquiry about our products and services or the products and services of our selected partners;

3.3.1.2. will keep you informed of events that we think will be of interest to you;

3.3.1.3. will use photographic images or video footage of you when you collect your vehicle from us and may use this material to promote our business via social media channels or via our websites; and

3.3.1.4. will use your interaction with our website and with our chat function to identify which products and services will be the most relevant to you and deliver targeted and relevant messages to you.

3.4. Your data that we process to comply with our contract,

3.4.1. We will process your data as required to perform **our contract** with you. This may include processing your order with the manufacturer of the vehicle that you have chosen and for completing warranty work or other after-sales obligations such as the provision of breakdown and recovery services.

3.5. Your data that we process in your vital interests

3.5.1. Where it is in your **vital interests**, we may use your information to organise and notify you about safety and product recall notices.

3.6. Your data that we process to comply with our legal obligations

3.6.1. We may process your information to comply with **legal obligations** including assisting HMRC, the Police, the Driver and Vehicle Licensing Agency, the Driver & Vehicle Standards Agency and the Financial Conduct Authority.

3.7. Your data that we process to pursue our legitimate interests

3.7.1. We may process your information to allow us to pursue our **legitimate interests** including for:

3.7.1.1. analysing our performance to further improve our customer services;

3.7.1.2. training and to administer our websites;

3.7.1.3. the prevention of fraud or other criminal acts;

3.7.1.4. undertaking credit checks for finance and vehicle mileage/condition checks;

3.7.1.5. complying with requests from you including if you exercise any of your rights noted in this Privacy Policy;

3.7.1.6. the purpose of corporate restructure or reorganisation or sale of our business or assets;

3.7.1.7. enforcing our legal rights or to defend legal proceedings and for general administration purposes;

3.7.1.8. contacting you about contractual changes;

3.7.1.9. contacting you by post or phone for service, maintenance & MOT reminders or by email where you are a recent customer;

3.7.1.10. contacting you for market research and satisfaction surveys;

3.7.1.11. (where you purchased goods or services before 25th May 2018) providing marketing information to you about our products and services or the products and services of our selected partners and to keep you informed of events that we think will be of interest to you;

3.7.1.12. providing you with information about the products or services that you have asked us to provide – including sending you videos of your vehicle being serviced;

3.7.1.13. responding to your enquiry concerning any of our products and services – including sending you a video of a vehicle that you have expressed an interest.

3.7.1.14. following an enquiry, up until purchase, we may keep you informed of events that may be of interest to you for up to 12 months.

3.8. Will we share your personal data with any third parties?

3.8.1. We may share your data with the relevant manufacturer or seller of the product that you have purchased or expressed an interest in purchasing and other companies within our group.

3.8.2. We may disclose your information to our third-party service providers for the purposes of providing services to us or directly to you on our behalf e.g. advertising agencies or administrative service providers. When we use third-party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

3.8.3. If we sell all or part of our business to a third party, we may transfer your information to that party to ensure that it can continue to provide information that you have requested or for any of the other purposes that we have noted above.

3.8.4. We may transfer your data to government or other official bodies for the purposes of complying with legal obligations, for enforcing our rights, or for the prevention or detection of a crime.

3.8.5 We do not sell your information to third parties. However, we may from time to time disclose your information to our partners (as above) to handle services on our behalf. We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated non-specific data sets wherever possible. Due to the international nature of our business, there may be some instances where your information is processed or stored outside of the EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

Manufacturer Brands – Abarth, Alfa Romeo, BMW, Citroen, Cupra, Fiat, Jeep, Kia, LEVC, Lexus, Mercedes-Benz Vans, Mazda, MINI, Peugeot, SEAT, Toyota, Volkswagen Commercial Vehicles, and Volvo

Finance & Insurance – Automotive Systems (UK), Autoprotect, Black Horse Limited, BMW Financial Services, Bumper Finance, Cooper Solutions, Cooke & Mason, Car Care Plan, DSG Financial Services, EMaC, Fiat Financial Services, Kia Finance, Mazda Financial Services, Nukula Ltd, Paintseal Europe, Premier Solutions, PSA Finance UK Ltd., Santander Consumer UK plc, Toyota Financial Services, Volkswagen Financial Services, and Volvo Financial Services

Marketing Partners – Keyloop, Cox Automotive, DP Publicity Ltd, Effemey Cosby Advertising Ltd, Enquiry MAX Ltd., GForces, Gubagoo Inc, IHS Market (Polk), Rapid RTC, Talent Stream, and Visitor Chat

Regulators – eg: The DVLA, The Financial Conduct Authority, The Information Commissioner's Office, and The Motor Ombudsman

3.9. How long do we keep your data?

3.9.1.1. If you have expressed an interest in buying products or services from us or from our selected partners, we will retain your contact details and related information concerning your enquiry for 12 months from the date of your enquiry unless you have consented for us to keep your information for a longer period. Where you have consented, we will retain your contact details and related information concerning your enquiry for 5 years from the date that we last had contact with you.

3.9.1.2. If you have purchased goods or services from us or from our selected partners, we will keep the data relating to that purchase (e.g. order forms and invoices and related correspondence) for 8 years from the date of the contract.

3.9.1.3. Voice recordings of telephone calls may be kept for up to 8 months.

3.9.1.4. CCTV recordings and images may be kept for up to 1 year.

3.9.1.5. Records of any discussions through our web chat facility will be kept for 6 months.

3.9.1.6. If you have requested that we do not send you marketing information we will always retain sufficient information to ensure that we remember to comply with your request.

3.9.1.7. The periods stated in this section 3.9 may be extended if we are required by law to keep your data for a longer period.

3.9.1.8 The period may be extended if there is an ongoing complaint, or issue.

4. Transferring your data outside of the United Kingdom ('UK')

4.1.1. The information that you send to us may be transferred to countries outside of the UK. By way of example, this may happen if any of our servers or those of our third-party service providers are from time to time located in a country outside of the UK. These countries may not have similar data protection laws to the UK.

4.1.2. If we transfer your information outside of the UK in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected. These measures include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us if you would like more information about the protections that we put in place.

4.1.3. If you use our services whilst you are outside the UK, your information may be transferred outside the UK to provide you with those services.

5. Cookies

5.1. We use Cookies on our website. A cookie is a small text file which is placed onto your computer (or other electronic device) when you visit our website. This enables us to monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of your internet service provider.

5.2. You can find out more about the Cookies we use in our [Cookies Policy](#)

5.3. You can set your browser not to accept cookies, however some of our website features may not function as a result.

5.4. For more information about cookies generally and how to disable them you can visit: www.allaboutcookies.org.

6. Data security

6.1. We have adopted appropriate technical and organisational measures to protect the personal data we collect and use having regard to the state of the art, the nature of the data stored and the risks to which the data is exposed to human action or the physical or natural environment. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database.

6.2. The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

6.3. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

7. Links to other websites

7.1. Our website may contain links to and from other websites (e.g. social media sites such as Twitter, Flickr, YouTube and Facebook). Unless we own such websites, we accept no responsibility for the way in which they process your personal data. You are recommended to check the privacy policy of each website before you submit any personal data to it.

8. Your rights

8.1. Your right to access data

8.1.1. We always aim to be as open as we can and allow people access to their personal information. Where we hold your personal data, you can make a 'subject access request' (see 8.1.2) to us and we will provide you with:

8.1.1.1. a description of it;

8.1.1.2. an explanation of why we are holding it;

8.1.1.3. information about who it could be disclosed to; and

8.1.1.4. a copy of the information in an intelligible form – unless an exception to the disclosure requirements is applicable.

8.1.2. If you would like to make a 'subject access request' please make it in writing by email to subjectaccessrequest@snows.co.uk or by post to our Group Communications & Marketing Director at the address shown in section 2.1 and mark it clearly as 'Subject Access Request'.

8.1.3. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

8.1.4. Unless you agree a different time, we will complete your subject access request within one month.

8.2. Right to stop marketing messages

8.2.1. You always have the right to stop marketing messages. We will usually include an unsubscribe button in any marketing emails. If you do wish to unsubscribe, please just click the unsubscribe button and we will promptly action that request. For text messages, please text back STOP to unsubscribe. Our online [data preference centre](#) helps you to exercise the rights that data privacy laws give you and control your personal information. Alternatively, you can update your marketing preferences by contacting us at any-time. Our contact details are shown in section 2.

8.3. Right to be forgotten

8.3.1. If we hold personal data about you, but it is no longer necessary for the purposes that it was collected and cannot otherwise be justified – you have the right to request that we delete the data.

8.4. Right to restrict data

8.4.1. If we hold personal data about you and you believe it is inaccurate you have the right to request us to restrict the data until it is verified. You also have the right to request that the data is restricted where you have a right to it being deleted but would prefer that it is restricted.

8.5. Transferring your personal data

8.5.1. Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under 3.3 and 3.4, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used, and machine-readable form, such as a CSV file.

8.5.2. You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information

8.6. Right to complain

8.6.1. You always have the right to complain to the personal data regulator, the [ICO](#).

9. Policy updates

9.1. This policy was last updated on 28 November 2022