

## SNOWS GROUP - CUSTOMER PRIVACY POLICY

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We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK data protection laws. You can read more about UK data protection laws on the UK Data Regulator's [website](#) (The UK Data Regulator is The Information Commissioner's Office or ICO).

### About us

We sell new and used vehicles and provide servicing and repairs in the South and Southwest of England.

We are the official retail and repair partner of many automotive brands – full details of the brands we represent are shown on our [website](#).

### Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	means Snows Motor Group Limited (Our company registered number is 01318267);
Our contact details	For any data protection related matter please contact: <ul style="list-style-type: none"><li>• by email to <a href="mailto:dataprotection@snows.co.uk">dataprotection@snows.co.uk</a> or;</li><li>• by post to: Data Protection Team, Snows Motor Group Limited, Snows House, Second Avenue, Millbrook, Southampton, Hampshire, SO15 0BT.</li></ul>
Personal data	means any information relating to an identified or identifiable individual.
Special category personal data	means Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic data, Biometric data (where used for identification purposes), Data concerning health, sex life or sexual orientation.
Data subject	means the individual who the personal data relates to.

### Personal data we collect about you.

The personal data we collect about you depends on the particular products and services we provide to you. The personal data that we collect and use may include:

- your name and contact information, including email address and telephone number and company details (if you are purchasing through a company) (**'Contact data'**)
- information to check and verify your identity, e.g. your date of birth or other personal data provided in the identity documents that you provide to us (**'Identity data'**);
- your purchase history including service and repair appointment bookings or details of your enquiry (including telephone call recordings) or interest or preferences about our products or services, such as possible planned purchase or lease date, vehicle(s) brand, make and/or model, or vehicle requirements (**'Purchase data'**);
- the registration number, brand, make and model of your vehicle (**'Vehicle data'**);
- the details and verification of your driving licence (including carrying out appropriate checks with DVLA) to verify your eligibility to legally drive vehicles and to meet the requirements of our insurers (**'Driver data'**);

- your image, actions and location if you are recorded on CCTV that we operate on and around our sites ('**CCTV data**');
- details about any marketing consents and marketing preferences ('**Marketing preferences**');
- demographic information (including your age range, employment status, marital status and household composition) ('**Demographic Data**');
- your billing information, transaction and payment card information ('**Billing Data**');
- your personal or professional interests ('**Interests Data**');
- information from social media accounts e.g. Facebook ('**Social Media data**')
- information to enable us to undertake credit or other financial checks on you ('**Credit check data**');
- information about how you use our website, IT, communication and other systems ('**Website data**');
- if we provide you with a courtesy or demonstration vehicle we may collect telematics data about your location, direction, speed, journey and other relevant driving information ('**Telematics data**');
- your responses to surveys, competitions and promotions ('**Survey Data**').

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below. If you do not provide personal data we ask for, it may delay or prevent us from providing products and services to you.

### **How your personal data is collected.**

We collect most of this personal data directly from you—in person, by telephone, text or email, via our website or through our advertisements that may be on third party websites.

We may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.:
  - sanctions screening providers;
  - credit reference agencies;
  - data from third party marketing services;
  - customer due diligence providers.
- from a third party with your consent, e.g. *your bank or building society*.
- from cookies on our website—for more information on our use of cookies, please see our [cookie policy](#).

via our IT systems, e.g.:

- from door entry systems and reception logs;
- through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

In addition, we may combine your personal data with other data held by third parties (such as vehicle and value data to allow us to provide vehicle valuation services).

If you provide us with personal information on behalf of someone else (e.g. if you provide your partner's details in connection with the purchase of a vehicle) you confirm to us that you have their permission to do so and that you have provided them with a copy of this policy. The exercise of any further rights in connection with such personal data will need to be done by the relevant individual.

### **How and why we use your personal data.**

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or

- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests.

The table below explains what we use your personal data for and why.

Why we are processing the personal data.	The personal data that we are processing.	The lawful basis that we are relying on.
<p>To provide our products and services to you, we may use your personal data to:</p> <ul style="list-style-type: none"> <li>• deliver goods or services;</li> <li>• to correspond and manage our relationship with you;</li> <li>• to keep you informed about our products and services;</li> <li>• to provide you with important reminders including when your vehicle needs a service and when you need to make a decision about your vehicle lease/finance;</li> <li>• to analyse how our customers want to interact with us.</li> </ul>	<ul style="list-style-type: none"> <li>• Contact data;</li> <li>• Identity data;</li> <li>• Purchase data;</li> <li>• Vehicle data;</li> <li>• Driver data;</li> <li>• Marketing preferences;</li> <li>• Demographic data;</li> <li>• Billing data;</li> <li>• Interests data;</li> <li>• Social media data;</li> <li>• Credit check data;</li> <li>• Website data;</li> <li>• Telematics data;</li> <li>• Survey data.</li> </ul>	<ul style="list-style-type: none"> <li>• To perform our <b>contract</b> with you.</li> <li>• Our <b>legitimate interests</b> to take steps at your request before our contract with you.</li> <li>• <b>Consent</b> (for marketing activities when required).</li> </ul>
<p>We may use your Personal Data specifically for legal reasons:</p> <ul style="list-style-type: none"> <li>• when required by applicable law;</li> <li>• to respond to legal proceedings;</li> <li>• to respond to a request from a law enforcement agency;</li> <li>• to contact you for the purposes of a recall or service measure;</li> <li>• to protect our rights including for our safety</li> <li>• to enforce our legal rights including to</li> </ul>	<ul style="list-style-type: none"> <li>• Contact data;</li> <li>• Identity data;</li> <li>• Purchase data;</li> <li>• Vehicle data;</li> <li>• Driver data;</li> <li>• CCTV data;</li> <li>• Billing data;</li> <li>• Credit check data;</li> <li>• Telematics data.</li> </ul>	<ul style="list-style-type: none"> <li>• Our <b>legitimate interest</b>, i.e. to minimise fraud that could be damaging for you and/or us;</li> <li>• To comply with our <b>legal obligations</b>;</li> <li>• For your <b>vital interests</b> if we are contacting you for the purposes of a product recall.</li> </ul>

<p>recover debts owed to us.</p>		
<p>We may use your Personal Data for our own business operations including for:</p> <ul style="list-style-type: none"> <li>• managing our business capability;</li> <li>• providing staff training;</li> <li>• our management accounts and general financial information</li> <li>• our communication</li> <li>• quality control;</li> <li>• our corporate governance, planning and audit;</li> <li>• Statutory returns.</li> </ul>	<ul style="list-style-type: none"> <li>• Purchase data;</li> <li>• Demographic data;</li> <li>• Billing data;</li> <li>• Website data;</li> <li>• Survey data.</li> </ul>	<ul style="list-style-type: none"> <li>• Our <b>legitimate interests</b> to help with the management of our business.</li> <li>• To comply with our <b>legal and regulatory obligations</b></li> </ul>
<p>We may use and share your Personal Data for changes in our business. This will include sharing your data with third parties that will or may take control or ownership of some or all of our business.</p>	<ul style="list-style-type: none"> <li>• Purchase data;</li> <li>• Vehicle data;</li> <li>• Driver data;</li> <li>• Marketing preferences;</li> <li>• Demographic data;</li> <li>• Billing data;</li> <li>• Interests data;</li> <li>• Social media data;</li> <li>• Credit check data;</li> <li>• Website data;</li> <li>• Telematics data;</li> <li>• Survey data.</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interests.</li> </ul>

### How and why we use your personal data—Special category personal data

We do not usually collect any Special Category Personal Data about you, except for:

- any driving or motoring offences revealed from a check of your driving licence;
- for customers with a disability who are seeking to purchase a vehicle supplied by us with the benefit of zero rated VAT relief (or any other tax benefits), we may require proof of your eligibility (including appropriate medical information) to process the benefit(s) or otherwise to process the transaction in accordance with the scheme rules, any relevant guidance and recognised best practice.

### How and why we use your personal data—sharing

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

## Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We may contact you by targeted advertising that is delivered through social media by using your personal information or use your personal information to help us identify other people that may be interested in our products or services.

We may also work with selected partners to display relevant online advertisements for you and our other customers on third party websites and social media platforms.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**') however we generally only provide you with updates about our products and services when you have **consented** for us to do so.

You always have the right to opt out of receiving marketing communications at any time by:

- contacting us at [dataprotection@snows.co.uk](mailto:dataprotection@snows.co.uk);
- using the 'unsubscribe' link in emails or 'STOP' number in texts; or
- our [online data preference centre](#) helps you to exercise the rights that data privacy laws give you and control your personal information.

Please allow up to 28 days for your unsubscribe to take effect. We will send you an email to confirm that you have been unsubscribed.

When you contact us we will often ask to check that the details that we hold about you are correct and this may include checking whether you are happy with the marketing preferences that you have previously provided.

We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.

## Who we share your personal data with

We routinely share personal data with:

- the manufacturer or distributor of the vehicle brand that you have purchased;
- our accredited vehicle finance and insurance partners;
- third parties we use to help deliver our products and services to you, eg payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our business, eg marketing agencies or website hosts;
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;
- credit reference agencies;
- our insurers and brokers;
- our banks.
- our auditors, e.g., in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually,

information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

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, ATG Web Management FZ LLC (UAE) and ATG 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 from customers on our behalf through the provision of the software services. When ATG 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.

#### Who we share your personal data with—further information.

If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

#### Where your personal data is held

Personal data may be held at our offices and those of our third-party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal data with').

Some of these third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens, see below: 'Transferring your personal data out of the UK and EEA'.

#### How long your personal data will be kept

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| <ul style="list-style-type: none"><li>• Contact data;</li><li>• Identity data;</li><li>• Purchase data;</li><li>• Vehicle data;</li><li>• Driver data;</li><li>• Marketing Preferences;</li><li>• Demographic Data;</li><li>• Billing data;</li><li>• Interests data;</li><li>• Social media data;</li><li>• Credit check data;</li><li>• Website data;</li><li>• Telematics data;</li></ul> | <ul style="list-style-type: none"><li>• If you have expressed an interest in our products or services (but not purchased anything or provided any marketing consent), the maximum time* that we will retain your personal data is 2 years from the date of your enquiry;</li><li>• If you have purchased goods or services from us (or from our selected partners (but not provided any marketing consent) the maximum time* that we will retain your personal data is until the later of: (i) 8 years from the date that we supplied goods or services to you; or (ii) 3 years from our last contact with you.</li><li>• If you have consented to receiving marketing from us the maximum time* that we will retain your personal data is 6 years from the date you last made contact with us (or longer if the above paragraph is applicable).</li><li>• Unless any of the above paragraphs apply the maximum time* that we will retain records of any discussions through our web chat facility is 6 months</li></ul> |
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- Survey data.
- Telephone call recording and CCTV data;
- The maximum time\* that we will retain CCTV data is 6 months.
- The Maximum time\* that we will retain your call recordings is 130 days.  
*Please note some calls on phone lines are recorded but not all.*

\* In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings with us.

When your personal data is no longer required we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

### Transferring your personal data out of the UK and EEA

Your personal data may be transferred to, stored, or otherwise processed in countries outside of the UK and European Economic Area ('EEA'). This may happen where a manufacturer, supplier or service provider is located outside of the UK/EEA.

We shall ensure that adequate safeguards are in place when transferring personal data outside the EEA. These steps include imposing contractual obligations on the recipient of your personal data or ensuring that the recipient is subscribed to recognised international frameworks for the protection of your personal data.

If you would like further information about data transferred outside the UK/EEA, please contact our Data Protection Team at [dataprotection@snows.co.uk](mailto:dataprotection@snows.co.uk).

### Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: <ul style="list-style-type: none"> <li>–at any time to your personal data being processed for direct marketing (including profiling);</li> <li>–in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims</li> </ul>
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

The right to withdraw consent	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consent by the mechanisms stated in the Marketing section above.</p> <p>Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>
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For more information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\)](#).

If you would like to exercise any of those rights, please email or write to us (our contact information is provided on the first page of this policy); and

- provide enough information to identify yourself and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates

### Keeping your personal data secure

We have appropriate security measures to prevent personal data from being lost accidentally, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality. We continually test our systems and are [Cyber Essentials](#) certified, which means we follow recommended Government industry standards for information security.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### How to complain

Please contact us if you have any queries or concerns about our use of your personal data (our contact information is provided on the first page of this policy). We hope we will be able to resolve any issues you may have.

You may also have the right to lodge a complaint with the [Information Commissioner](#) (the UK data protection regulator).

### Changes to this privacy policy

This privacy notice was last updated on 21/02/2024

### How to contact us

You can contact us and/or our Data Protection Team by post or email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown on the first page of this policy.