

Your privacy is our top priority. Your trust in our products, services and people is of utmost importance to Jemca Car Group. To provide you with the best possible experience, we are focused on continuous improvement for everything we do. In order to achieve this, we will collect, use, transfer and store your data. You deserve to be informed in the most transparent way about how we treat and protect this data. Please take a few moments to read our Privacy Policy and don't hesitate to contact us if you have any questions or concerns.

Who are we

When we say 'we' or 'us' in this policy, we're generally referring to the separate and distinct legal entities that make up the Jemca Car Group, these include:

- Toyota Tsusho Automobile London Holdings Limited (registered office: The Hyde, Edgware Road, London, NW9 6BH), Company number 04843255, ICO Registration number: Z7467719
- Jemca Car Group Limited (registered office: The Hyde, Edgware Road, London, NW9 6BH), Company number 01462441, ICO Registration number: Z4812637

What sorts of information do we hold

We collect the following personal information about you when you talk to us on the phone or in our car dealerships, including recorded calls.

- Information that you provide to us when enquiring or taking out the services that we provide to you such as your name, address, date of birth, telephone number, email address, bank account, payment card details and current vehicle details
- Information from other sources such as our partners (like Toyota (GB) PLC, Autotrader, Rapid response), specialist companies that provide customer information (like credit reference agencies, fraud prevention agencies)
- information about your vehicle (including your Vehicle Identification Number ("VIN"), vehicle registration number, model, age and mileage)
- CCTV images from our showroom forecourts
- Information you provide when visiting us (names, company and vehicle registration)
- Information you provide when using our free Wi-Fi when visiting us (email address)

How we will use your personal information

The information we collect may be used to:

- make available our Services (Sales, Service and MOT) to you
- process your orders
- take payment from you or give you a refund
- take out a finance plan on the purchase of a vehicle
- process a part exchange on your current vehicle
- prevent, deter and detect crime

There are different lawful grounds that we rely on to use your personal information and we will collect and use your personal information in the following situations:

- where our use of your personal information is necessary to perform a service plan or contract that you are a party to, or to take steps that you request before entering into a contract
- where our use of your personal information is within our legitimate interests or the legitimate interests of the organisation with which we have shared your personal information, for example MOT reminders, Service reminders, warranty expiry, CCTV



- where we believe it is necessary to use your personal information to comply with a legal or regulatory obligation to which we are subject
- where we have your consent

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Sharing your data

We work with partners, suppliers, insurers and agencies so they can process your personal information on our behalf, but only where they meet our standards on the processing of data and security! We only share information that allows them to provide their services to us or to facilitate them providing their services to you.

- companies or other organisations that we have engaged to provide services on our behalf such as car valuation services, finance providers and information technology providers;
- companies or other organisations where you have asked us to or agreed that we may share your personal information with them;
- professional advisors;
- companies or other organisations that provide vehicle health checks
- companies or organisations that provide vehicle service plans
- companies or organisations that provide security monitoring of showroom forecourts
- any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues; or
- any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Policy.

Jemca Car group will share any personal information we hold about you, including your contact details, your vehicle identification number (VIN), registration number, order information and purchasing history, mobility information and service information), with Toyota (GB) Plc ("Toyota (GB)"). Toyota (GB) may share this information with its group and affiliate companies (the "Toyota Group") and Toyota (GB)'s privacy policy where you have provided your consent to do so.

Transferring your personal information internationally

Your personal information will be treated in accordance with UK law concerning data protection and may be transferred within the European Economic Area ("EEA"), as well as to countries outside the EEA. When we transfer your personal information outside the EEA we will put in place appropriate safeguards in accordance with our legal obligations to ensure that your personal information is adequately protected irrespective of the country to which it is transferred.

Keeping you informed about our products and services

We would like to tell you about the great offers, ideas, products and services of the Jemca Car Group from time to time that we think you might be interested in. Where you have consented to us doing so, we may do this through the post, by email, text message, online, using social media,



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. You may opt-out of such communications at any time by clicking the "unsubscribe" link found within emails. All Jemca Car Group service customers will continue to receive transactional messages related to our Services, even if you unsubscribe from promotional emails.

If you wish to amend your marketing preferences, you can do so by contacting us on the contact details below.

Data Security

We will ensure that appropriate technical and organisational security measures are taken to protect your personal information from misuse, destruction and accidental loss or disclosure. If we engage an external party to provide us with services that involve the processing of your data we will make sure that they have appropriate security measures in place and only process your information in the way that we have authorised them to.

How long we keep your data

We will retain your personal data for as long as it necessary for the purpose of our relationship or until you object to us processing it or withdraw your consent.

Lodging a complaint in the EU

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues at https://ico.org.uk/concerns/

Links to third party websites

This website may contain links to and from other websites (e.g. external social media sites). 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.

Your Rights

Individuals whose personal data we hold, and process have the following rights:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you in incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal because it is in our legitimate interests to do so, you can object to us using it this way.
- In some circumstances, you can restrict our processing of your data, request a machine-readable copy of your personal data to transfer to another service provider and compel us to erase your personal data

If you wish to exercise your rights, please contact us at <u>dataprivacy@jemca.co.uk</u>. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.



How to contact us

You can contact Jemca in relation to data protection and this privacy notice by writing to:

Data Protection Jemca Car Group The Hyde Edgware Road London NW9 6BH United Kingdom

Alternatively, you can email us at <u>dataprivacy@jemca.co.uk</u>

Changes to this privacy notice

You should note that we may change this privacy policy without notice. Please check back frequently to see any updates or changes made to this statement.

May 21, 2018