**Website Privacy Policy**

*IMPORTANT NOTICE*

*This document does not constitute legal advice. It should be tailored to reflect your specific requirements and usage of data following a data audit in accordance with the legislation, guidance and Codes of Practice issued by the Information Commissioner. This policy is designed to be used in conjunction with an appropriate Data Retention Policy and a Data Security Policy.*

**Website privacy policy**

This website is operated by [*insert name and description of organisation*].

We take your privacy very seriously and we ask that you read this privacy policy carefully as it contains important information on:

1. the personal information we collect about you;
2. what we do with your information, and
3. who your information might be shared with.

**Who we are**

[*insert name of data controller*] ('we' or 'us') are a 'data controller' for the purposes of the relevant data protection legislation including the Data Protection Act 2018, the General Data Protection Regulations and any subsequent legislation as appropriate.(i.e. we are responsible for, and control the processing of, your personal information).

**What information we collect?**

**Personal information provided by you**

We collect the following personal information about you when you register with us, express an interest in or purchase products or services from us. We also collect personal information when you [*contact us, send us feedback, post material to our website, complete customer surveys or participate in competitions*].

**Personal information provided by third parties**

Occasionally we may receive information about you from other sources (such as credit reference agencies, medical professionals, or your employer), which we will add to the information we already hold about you in order to help us [*insert details, e.g. provide products and services, improve and personalise our service to you*].We will always seek your permission to contact these people for your information.

**The information we collect may include:**

1. Basic personal details such as your name, address, e-mail address, telephone number, date of birth or age, gender, marital status;
2. Additional information regarding your vehicle including the registration, VIN number, service history, any works undertaken, insurance policy details, MOT and Tax status of the vehicle;
3. Sensitive personal information may be collected where a vehicle is purchased under the Motability scheme. This may include details of any medical conditions. We will always be clear to explain when and why we need this information and the purposes for which we will use it and will obtain your explicit consent to use sensitive personal information;
4. *[insert as appropriate]*

**Personal information about other individuals**

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

1. give consent on his/her behalf to the processing of his/her personal data;
2. receive on his/her behalf any data protection notices;
3. give consent to the transfer of his/her personal data abroad; and
4. give consent to the processing of his/her [*insert category or categories of sensitive personal data, e.g. health information*].

**Sensitive personal information**

We may ask you to provide sensitive personal information, for example where you require us to tailor our goods or services to an existing physical condition e.g. as part of the Motability scheme, or where you are applying for a finance or an insurance product and we are required to enquire whether you have committed a criminal offence. If we request such information, we will explain why we are requesting it and how we intend to use it.

Sensitive personal information includes information relating to:

1. your ethnic origin;
2. your political opinions;
3. your religious beliefs;
4. whether you belong to a trade union;
5. your physical or mental health or condition;
6. your sexual life, and
7. whether you have committed a criminal offence

 We will only collect your sensitive personal information with your explicit consent.

**Monitoring and recording communications**

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of [*insert details, e.g. quality assurance, training, fraud prevention and compliance*].

**Use of cookies**

A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our website. We use cookies **[**and other similar tracking technologies such as [*insert details, e.g. web beacons, action tags, Local Shared Objects (‘Flash cookies’), single-pixel gifs*]**]** on our website.

For example, we may monitor [*how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider*]. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

**[**You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.**]**

For further information on our use of cookies, **[**including a detailed list of your information which we and others may collect through cookies**]** please see our Website cookie policy.

 For further information on cookies generally visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

**How will we use the information about you?**

We collect information about you so that we can:

1. identify you and manage any accounts you hold with us;
2. process your order;
3. maintaining a service record for your vehicle, conduct research, statistical analysis and behavioural analysis;
4. carry out customer profiling and analyse your purchasing preferences;
5. if you agree, let you know about other products or services that may be of interest to you — see 'Marketing’ section below;
6. detect and prevent fraud;
7. verifying your identity and carry out anti-fraud checks (see 'Credit checking' section below),
8. providing you with payment options,
9. assessing your application for a product, service or quote,
10. ensuring that you can afford any financial agreement offered,
11. ensuring that any insurance products are suitable for you,
12. administer your any finance agreements including updating you on and delivering our services,
13. monitor your use of our Websites and any response to advertising campaigns;
14. and [*insert details on any other purposes, e.g. any additional purposes for which personal data collected using cookies and other tracking devices might be used*].

We may also offer enhanced services including MOT and service reminders where we believe this would be helpful or of interest.

Where your vehicle manufacturer maintains an electronic service record of your vehicle we may share details of any work with your manufacturer so that an accurate record can be kept.

**Marketing**

We would like to send you information by post, email, telephone, text message (SMS) or automated call about [*insert details, e.g. products and services*], competitions and special offers which may be of interest to you.

**[**Other businesses [*within our group or* ] which we have selected carefully (i.e. [*insert the names of the organisations or specify the type of third party*]) may also send you similar marketing messages, depending on what you agree with us.**]**

We will only ask whether you would like us **[**and other businesses**]** to send you marketing messages when you tick the relevant boxes when you [*insert details, e.g. complete our online order form for the first time*]. Click here [*insert link*] to see what this form looks like [*Insert details*].

If you have consented to receive such marketing from us, **[**[*our group*] or other businesses,**]** you can opt out at any time. See 'What rights do you have?’ below for further information.

**[**You can also manage your preferences by using our privacy dashboard at [*insert details*].**]**

**Credit checking**

We may do a credit check on you:

1. so that we **[**and other companies in our group**]** can make credit decisions about you and members of your household, and
2. to prevent and detect fraud and money laundering

Our search will be recorded on the files of the credit reference agency.

We may also disclose information about how you conduct your account to credit reference agencies and your information may be linked to records relating to other people living at the same address with whom you are financially linked.

Other credit businesses may use your information to:

1. make credit decisions about you and the people with whom you are financially associated;
2. trace debtors, and
3. prevent and detect fraud and money laundering.

If you provide false or inaccurate information to us and we suspect fraud, we will record this.

If you want to see your credit file, please contact the credit reference agency which we use [*insert details*].

**Who your information might be shared with**

We may disclose your personal data to:

1. other companies within our group;
2. **[**our agents and service providers;**]**
3. **[**credit reference agents—see 'Credit checking' below;**]**
4. law enforcement agencies in connection with any investigation to help prevent unlawful activity;
5. our business partners in accordance with the 'Marketing and opting out' section above; and
6. [*insert details on any other disclosures*].

When you enquire about, or purchase, our products or services we may provide details of the vehicle to the manufacturer. This is in accordance with our manufacturer franchise agreement and is transmitted over a secure connection to their servers.

When you purchase a new vehicle from us, we are obliged to submit some of the personal information to the Driver and Vehicle Licensing Agency (DVLA) in order to register that vehicle.

When you service your vehicle with us we submit some of the personal information to the relevant government agencies to ensure your vehicle’s data is maintained.

If you do not wish for the above obligatory transfers to take place, you must advise this as the point of providing the data. Please note that this may prevent us from being able to provide the goods or services requested. Where this is the case you will be given the option of how you wish to proceed.

**Keeping your data secure**

We will use technical and organisational measures to safeguard your personal data, for example:

1. access to your account is controlled by a password and user name that are unique to you;
2. we store your personal data on secure servers; and
3. payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

**[**We are certified to ISO 27001. This family of standards helps us manage your information and keep it safe and secure.**]**

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see ‘How can you contact us?’ below).

**What can I do to keep my information safe?**

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

**Transfers of your information out of the EEA**

**[**We may need to transfer your personal data to [*insert details on the relevant countries and territories*] **[**all of which are located outside the European Economic Area,**]** for the purpose of [*insert details*]. Any transfer of your data will be subject to a European Commission approved contract that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

OR

When you signed up for [*insert details, e.g. membership of this website*] you agreed that we may transfer your personal data to [*insert countries*] **[**all of which are located outside the European Economic Area,**]** for the purpose of [*insert purposes*]. Rest assured that we will always ensure any transfer is subject to appropriate security measures to safeguard your personal data.

**What rights do you have?**

**Right to request a copy of your information**

You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or it, please:

1. email, call or write to us (see ‘How can you contact us?’ below);
2. let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
3. let us know the information you want a copy of, including any account or reference numbers, if you have them

**Right to correct any mistakes in your information**

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please:

1. email, call or write to us (see ‘How can you contact us?’ below);
2. let us have enough information to identify you (e.g. account number, user name, registration details), and
3. let us know the information that is incorrect and what it should be replaced with.

**Right to ask us to stop contacting you with direct marketing**

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

1. email, call or write to us (see ‘How can you contact us?’ below). **[**You can also click on the ‘unsubscribe’ button at the bottom of the email newsletter. It may take up to [*insert figure*] days for this to take place**]**
2. let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
3. let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

**Right to restrict processing and to be forgotten**

Where your details are no longer needed to perform our contractual obligations, You have the right to restrict how we use your data, including to request that we delete any or all personal data we hold on you. The only reason we would not carry out this request is if it would result in us being in breach of other legal or regulatory obligations we have,

If you would like to do this, please:

1. email, call or write to us (see ‘How can you contact us?’ below). You can also click on the ‘unsubscribe’ button at the bottom of any of our customer emails or on our [preference centre](http://www.rygor.co.uk/yourdata/) on the website. Unsubscribing through the preference centre or via emails is instant. All other updates will take place within 7 working days.
2. let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
3. let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

**Right to transfer your data**

Where data is processed automatically you have the right to request that we provide a copy of the data in a commonly read format to another controller. The only reason we would not carry out this request is if it would result in us being in breach of other legal or regulatory obligations we have,

If you would like to do this, please:

1. email, call or write to us (see ‘How can you contact us?’ below). You can also click on the ‘unsubscribe’ button at the bottom of any of our customer emails or on our [preference centre](http://www.rygor.co.uk/yourdata/) on the website. Unsubscribing through the preference centre or via emails is instant. All other updates will take place within 7 working days.
2. let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
3. let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

**How to contact us**

Please contact us OR [*insert details*], our Data Protection Officer, if you have any questions about this privacy policy or the information we hold about you.

If you wish to contact us, please send an email to [*insert email address*] or write to us at [*insert address*] or call us on [*insert telephone number*].

**Changes to the privacy policy**

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

**[Do you need extra help?]**

**[**If you would like this policy in another format (for example: audio, large print, braille) please contact us (see ‘How can you contact us?’ below).**]**