

# PRIVACY POLICY

Ring Automotive Limited collects and processes your personal data when you interact with us. For the purposes of this Privacy Policy, references to “we”, “us” or “the organisation” shall refer to Ring Automotive Limited. The organisation is the data controller of your personal data and is responsible for complying with data protection laws. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

By providing your personal data, you acknowledge that we may use it only in the ways set out in this Privacy Policy.

From time to time we may need to make changes to this Privacy Policy, for example as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally.

## Our privacy principles

When we collect and use your personal data, we ensure we look after it properly and use it in accordance with our privacy principles below

- Personal data is processed fairly and lawfully
- Personal data is obtained only for specific, lawful purposes
- Personal data is adequate, relevant and not excessive
- Personal data is accurate and kept up to date
- Personal data is not held for any longer than necessary
- Personal data is processed in accordance with the rights of data subjects
- Personal data is protected in appropriate ways
- Personal data will not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

## How do we collect your personal data?

We collect personal data directly from you:

- via an enquiry;
- when you create an account with us;
- when you purchase any of our products or services;
- through quotes and application forms;
- via cookies. You can find out more about this in our cookies policy;
- via our telephone calls with you;
- via emails;
- when you provide your details to us either online or offline;
- when you engage with us on social media;

We also collect your personal data from a number of different sources including:

- credit reference agencies;

## What personal data do we collect?

We collect and process a range of data about you. This includes

- contact details such as name, email address, postal address and telephone number;
- financial information such as bank details, credit card details and information obtained from our credit checks;
- details of your interactions with us through our branches or online;
- information about the nature of your business and commercial assets;
- your image may be recorded on CCTV when you visit a branch;
- information obtained through our use of cookies. You can find out more about this in our cookies policy;
- your marketing preferences;

## How do we use your personal data?

We mainly use your personal data to provide you with goods and services. There are a number of other reasons we use your personal data, as explained in the list below:

- In certain circumstances we need your personal data to comply with our contractual obligations, for example to fulfil our sales order processing and our purchasing;
- In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business, such as maintaining our business records and developing and improving our products and services, all whilst ensuring that such business needs do not interfere with your rights and freedoms and does not cause you any harm;
- We may need to collect and process your personal data for legal compliance, for example we may need to pass on details of people involved in fraud or other criminal activity affecting the organisation to the relevant authorities;
- In specific situations, we can collect and process your data with your consent. We will usually only ask for your consent when providing marketing information to you, including information about other products and services. If we ask for your consent, we will explain why it is necessary.
- To protect our customers, premises, assets and employees from crime, we operate CCTV systems on our premises which record images for security. We do this based on our legitimate business interests;

## Who has access to the data?

Your information may be shared internally within the organisation, including with the Directors, members of the finance team, IT staff and other employees if access to the data is necessary for performance of their roles.

Also, we may sometimes share your data with trusted third parties that process the data on our behalf. We share only the personal information they need to perform their specific services and they may only use your data for the reasons we've described.

We work closely with the third-party data processors to ensure your privacy is respected and protected always.

## How do we protect the data?

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees in the performance of their duties.

We secure access to our systems and access to your personal data is password protected.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## For how long do we keep the data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. The time we retain your personal information for will differ depending on the nature of the personal information and what we do with it.

## Your rights

As a data subject, you have the following rights in relation to our use of your personal data:

- Access - You are entitled to a copy of the personal data we hold about you and certain details of how we use it
- Rectification - We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case, please contact us by using the details shown in your documentation and you can ask us to update or amend it.
- Erasure - In certain circumstances, you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors, for example according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.
- Restriction of processing - In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to process your personal information.
- Data portability - In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.
- Direct marketing - You can ask us to stop sending you marketing messages at any time. Please see the Marketing section for more information.

- Withdraw consent - For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

If you would like to exercise any of these rights, please contact [is.helpdesk@ringautomotive.com](mailto:is.helpdesk@ringautomotive.com) or in writing to Ring Automotive Limited, Gelderd Road, Leeds, LS12 6NA

If we choose not to action your request, we will explain to you the reasons for our refusal.

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office on 0303 123 1113

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

## Marketing

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to unsubscribe from emails sent by us, you may do so at any time by following the unsubscribe instructions that appear in all emails