

# Car Hunter

## 'Privacy Policy'

Car Hunter is a premium automotive dealer that is committed to providing an excellent service for customers during the purchasing process and ownership of a vehicle.

### You can contact Car Hunter by the following methods:

- By telephone: **07561262007**
- By email to: [info@carhunterni.com](mailto:info@carhunterni.com)
- By website: [www.carhunterni.com](http://www.carhunterni.com)
- By post to: **Car Hunter, 135 Ballynadrone Meadows, Craigavon, Northern Ireland, BT67 0FZ**

### This Policy was last updated:

- **6<sup>th</sup> February 2024**

### What data do we collect:

Personal Data means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or technical data about a vehicle.

We collect and process personal data about you which we have grouped together into different types of data to make it easier for you to understand what we do with your personal data:

- **Contact Data** – details of your name(s), home address, previous home address, home phone number (including mobile), home email, work address, work phone numbers (including mobile) and social media username.
- **Identity Data** – details of your passport, driving licence, date of birth, utility bills, national insurance number and nationality if required as part of your vehicle finance application.
- **Financial Data** – details of your bank account, bank statements, purchase agreement, your employment history and salary if required as part of your vehicle finance application.
- **Transaction Data** – details about payments to and from you and other details of products and services you have purchased from us.
- **Website Data** - our website provider stores as standard details of your browser and operating system, the website from which you visit our websites, the pages that you visit on our websites, the date of your visit to the website, web browsing behaviour, demographics and statistics and the internet protocol (IP) address assigned to you by your internet service provider.
- **Image Data** – photographic images and footage of you may be collected via the operation of CCTV when you come to our office. We may take photographs or videos of you at point of collection for marketing purposes with your consent. We do not record calls made via video apps therefore no image data is retained in this format.
- **Audio Data** – we currently do not record calls with customers but will advise if this process changes.
- **Social Network Data** – details of personal data that is part of your public profile on a third-party social network may be collected if you like, follow, message, share content, post opinion or comment on any of our Car Hunter social pages.
- **Family Data** – details of your direct family such as their name for example to purchase a vehicle for them and allow the vehicle to be registered to the correct keeper.
- **Chat Data** – conversations you may have with digital teams via live chat windows on Autotrader or Used Cars NI, text messages or apps.
- **Public Authority Data** – details about you and your vehicle held with the driving and vehicle licencing agency (DVLA) including any penalties you may have on your driving licence. Should you incur a fixed penalty or fine when test driving a vehicle, we will share your contact details with the respective third party, police or local authority.
- **Analytics Data** – this is personal data on how you interact with us, this may relate to your vehicle choice or current vehicle, how you use and engage with our services, apps or websites or to allow us to provide you with our best level of service.

## What is the legal basis for processing your personal data:

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Contractual performance** – where we need to process your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering such a contract.
- **Legal or regulatory obligation** – when we must process your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- **Legitimate interest** – when it is in our legitimate interest (or that of a third party) and those interests do not override your rights and freedoms, for example when it is in the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Vital interests** – where it is necessary to process your personal data to protect your vital interests or another person.
- **Consent** – generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by us using the contact details as specified in this document.

## Storage and how long do we retain your personal data:

Personal data is stored remotely and securely in a cloud-based customer accounting and management system. Access is only available by multi-factor authentication by authorised persons. Regular reviews of our security protocol for accessing this system are completed and documented.

We retain your personal data only as long as necessary for the purpose for which we obtained it and any other authorised and linked purposes. If personal data is used for more than one purpose, we will retain it until the purpose with the latest period expires. However, we will stop using it for the purpose with a shorter period once that period expires.

Our retention periods are based on business needs and your personal data that is no longer needed is either irreversibly anonymised or destroyed securely.

- Vehicle sales documentation up to 7 years all formats
- Electronic communications by email up to 3 years

## Your data protection rights:

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us using the details as specified in this document if you wish to make a request.

**How to complain:**

Car Hunter is registered with the Information Commissioner's Office under registration number ZB617100

If you have any concerns about our use of your personal information, you can make a complaint to us at any time by us using the contact details as specified in this document.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>