

Privacy Notice

Interest Free 4 Cars

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Revision History

<i>Version</i>	<i>Revision Date</i>	<i>Revised by</i>	<i>Section Revised</i>
1.1		Mark Taylor	All

Document Control

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Who We Are

Interest Free 4 Cars is a trading style of Goball Ltd. (*'we' or 'us' or 'our'*) gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Interest Free 4 Cars's registered office is at Bradbury & Co, 34 Middle Street South, Driffield, East Yorkshire, YO25 6PS and we are a company registered in England and Wales under company number 07704439. We are registered on the Information Commissioner's Office Register; registration number ZA0088233, and act as the "Data Controller" and / or "Data Processor" when processing your data. Our designated Data Protection Officer/Appointed Person is Mark Taylor, who can be contacted at Bridge Haven One, Saxon Way, Hessle, HU13 9PG or privacy@interestfree4cars.co.uk

Information That We Collect

Interest Free 4 Cars processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect from: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- National Insurance Number
- Passport Number
- Driver's License Number
- Bank Details
- Employment Details

We collect information in the below ways: -

- Via form submissions through our website
- By telephone through incoming or outbound calls

- From you directly within our branches
- From third Party websites (Such as Auto Trader, Zuto, Car Finance 24-7) where we obtain your personal data from a third party we will tell you from where it was sent.

How We Use Your Personal Data

Interest Free 4 Cars takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. ***The purposes and reasons for processing your personal data are detailed below: -***

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed.
- We collect and store your personal data as part of our legal obligation for business accounting and tax purposes.
- Where you intend to purchase a vehicle on finance, we will share your information with chosen finance companies and brokers, who in turn have a legal obligation to share your personal data with credit reference agencies to provide them with financial background checks prior to you commencing employment with us. (Interest Free 4 Cars will not be given details of these searches, other than the decision made).
- We will occasionally send you information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.

Your Rights

You have the right to access any personal information that Interest Free 4 Cars processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any

direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

At Interest Free 4 Cars, we will not subject your data to any automated profiling or decision making. It is however likely that where we share your information with a company for obtaining finance on a vehicle, that they will perform credit checks that could involve some automated decision making. Where this is the case the companies will do this on the grounds that they have a legal or contractual obligation to do so.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Interest Free 4 Cars uses third parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

We use the following third parties:	For the following purposes:	You can view their privacy policy by copying and pasting the following link into your web browser:
Reef	Sales processing system. Customer data is inputted by our team and held within this system. REEF then shares our data with Cooper Solutions/ Auto Protect/ Dealtrak 123/ Product Partnerships (see below).	Privacy policy pending
Cooper Solutions	Part exchange processing/ valuation system. Customer data can be entered manually or, as above, transferred from the Reef database.	https://www.coopersolutions.co.uk/public/privacy-policy/
Auto Protect	Insurance & paint protection sales are registered / recorded in this system. Data can be entered manually by ourselves or transferred from the Reef database.	https://www.autoprotect.co.uk/privacy
Dealtrak 123	Customer details are entered, or partially transferred from Reef, and then sent to finance	http://www.dealtrak.co.uk/privacy-cookie-policy/

	partners below for the purpose of credit applications.	
Product Partnerships	Customer details are entered, or partially transferred from Reef, and stored to record the information required to demonstrate any finance sale was FCA compliant.	https://www.productpartnerships.com/privacy-policy.php
Nexus Point	Website design/ management company. Customers complete enquiries & finance applications via their system. This information is then shared with us/ Code Weavers.	https://www.nexuspoint.co.uk/privacy-policy
Nexus Point*	Will be the provider of our full management system which replaces Reef, Autoview and further systems as developed.	https://www.nexuspoint.co.uk/privacy-policy
Code Weavers	Finance applications from the website (Nexus Point) are managed / held within this system. Data can be transferred to Dealtrak 123 for processing.	https://codeweavers.net/privacy
PAB	Marketing company who market our database on our behalf.	http://www.pabstudios.co.uk/privacy-policy.html
Mailchimp	Bulk email distribution service. Used for our newsletters and, where applicable some system generated emails during our sales process.	https://mailchimp.com/legal/privacy/
Intrasource	IT support/ management company. Intrasource are our system administrators.	Privacy policy pending
Microsoft	We utilise Microsoft Office 365, data is held and transferred using both Outlook and Excel.	https://products.office.com/en-gb/business/office-365-trust-center-privacy
Contact at Once	Live chat system on our website. Customers can submit personal information within the conversations and the system will attempt to build a profile based on this. Data then stored	http://www.contactatonce.com/privacy-policy/

	within their system and shared with only us via email.	
Auto Trader	Vehicle/ Finance enquiries/ applications submitted within their system and shared/ sent to us.	https://www.autotrader.co.uk/privacy-policy
Motors	Vehicle/ Finance enquiries/ applications submitted within their system and shared/ sent to us.	https://www.motors.co.uk/privacy/
Car Gurus	Vehicle/ Finance enquiries/ applications submitted within their system and shared/ sent to us.	https://www.cargurus.co.uk/Cars/privacyPolicy.html
Exchange and Mart	Vehicle/ Finance enquiries/ applications submitted within their system and shared/ sent to us.	http://www.exchangeandmart.co.uk/privacy-policy
Judge Service	Customer data supplied to them which they use to obtain reviews on our behalf.	https://business.judgeservice.com/privacy-policy/
Black Horse	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://www.blackhorse.co.uk/privacy
Santander	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://www.santander.co.uk/uk/business/data-protection
Motonovo	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://www.motonovofinance.com/privacy-policy
Barclays	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance	https://www.barclays.co.uk/important-information/privacy-policy/

	approval. On occasion they will send us customer data for the purposes of prospecting.	
FCA	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	http://www.fcaautomotiveservices.co.uk/templates/FGAC/APITAL/media_1/PDF/Data%20Protection%20Guide_FCAAS_January%202018.pdf
Hitachi	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://www.hitachipersonalfinance.co.uk/privacy-policy/
Blue	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://bluemotorfinance.co.uk/home/privacy_policy
Moneyway	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://www.moneyway.co.uk/privacy-statement
Startline	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://startlinemotorfinance.com/privacy-cookie-policy/
London & Surrey	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	http://www.lsmf.co.uk/privacy-policy.php
First Stop	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://www.firststop.co.uk/cms/fst_privacyPolicy.html
Marsh	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	http://www.marshfinance.com/privacy/

Evolution	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://www.evolutionmoney.co.uk/legal/privacy-policy
New Look Loans	Finance provider. Customer data sent to them either directly or via Dealtrak 123 for finance approval. On occasion they will send us customer data for the purposes of prospecting.	https://www.newlookloans.co.uk/privacy-policy/
Car Finance 247	3rd party broker who supply us with customer data in the form of pre-approved finance customers. This data used in conjunction with them to sell vehicles.	https://www.carfinance247.co.uk/privacy-policy
Zuto	3rd party broker who supply us with customer data in the form of pre-approved finance customers. This data used in conjunction with them to sell vehicles.	https://www.zuto.com/privacy/
Credit Plus	3rd party broker who supply us with customer data in the form of pre-approved finance customers. This data used in conjunction with them to sell vehicles.	http://www.buildcreditplus.com/privacy-policy/?doing_wp_cron=1523867636.9799540042877197265625
Autoview	Dealer management system used for all sales & service invoicing / accounting.	Privacy policy pending
Bradbury's	External accountant / auditors.	Privacy policy pending
Bright HR	HR system which contains all staff records.	https://www.brighthr.com/terms
Box-It	Confidential waste disposal services. Box-It remove and destroy all paper based confidential waste, a certificate of destruction is supplied for this. Box-It have no access to the data being destroyed.	https://www.boxit.co.uk/privacy-policy/

Safeguarding Measures

Interest Free 4 Cars takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including SSL, TLS, restricted access, IT authentication, firewalls, anti-virus and anti-malware.

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data.

Interest Free 4 Cars utilise some products or services (*or parts of them*) that may be hosted/stored in The United States of America which means that we may transfer any information which is submitted by you through the website outside the European Economic Area ("EEA") for the below purposes: -

The services we use that involve data being sent out of the EU are done so using a company called Mail Chimp, we use this company for our email database, Mailchimp also handle our automated emails servers. Therefore, when you access these services the personal information you submit may be stored on servers which are hosted in The United States of America Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by Interest Free 4 Cars to protect your data and comply with the relevant data protection laws.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Interest Free 4 Cars, however as some of this information is required for the purposes fulfilling legal and/ or contractual obligations we will not be able to offer some/ all of our services without it.

Legitimate Interests

As noted in the '*How We Use Your Personal Data*' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing information relating to existing customers with additional products purchased (Such as warranty or service plan). We also process data using the legitimate interest's basis when dealing with complaints. We have identified that our interests are necessary for providing the customer with the correct level of service on an ongoing basis, and pose very little or no threat to the rights and freedoms of the data subject.

How Long We Keep Your Data

Interest Free 4 Cars only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed. We are also required to keep details of any complaints received for a period of 3 years, or 5 years where the complaint relates to financial services. If you contact us in relation to a general enquiry we will also keep a record of this for a period of 90 days, unless you consent to marketing. Customer records relating to marketing are retained for a period of 12 months, this is then renewed on an annual basis.

For customers who have purchased additional services, such as warranty or servicing, we retain these records for a period of 6 years plus the balance of the original financial year.

All of our telephone calls are recorded for training and monitoring purposes, we retain these for a period of 12 months.

Full details of our Data Retention periods are outlined in our Data retention policy. Specific queries can be dealt with in response to an email sent to privacy@interestfree4cars.co.uk

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Lodging a Complaint

Interest Free 4 Cars only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Interest Free 4 Cars

Mark Taylor

Bridge Haven One, Saxon Way, Hessle, HU13 9PG

privacy@interestfree4cars.co.uk

Information Commissioners Office

Wycliffe House, Water lane, Wilmslow, SK9 5AF

Telephone: 0303 123 1113

Consent

Interest Free 4 Cars take your privacy seriously and will only process your personal data with your consent and in accordance with the terms stated in our Privacy Notice. We may capture your consent in person or electronically. In some instances, failure to provide consent can restrict our ability to offer you our full range of services.

Cookie Notice

A **'cookie'** is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <https://www.aboutcookies.org>.