

Johnson & Perrott Limited

Privacy Policy

Please note that throughout this document the words “we”, “use”, “ours” refers to Johnson & Perrott Limited.

This privacy policy describes how Johnson & Perrott Limited collects and processes your personal data, including any data you may provide when you access our website and/or other websites controlled by Johnson & Perrott Limited, when you enquire about a product or service from us, through your dealings with our staff and or through any other interactions in connection with our contract with you. Please take the time to read it carefully. You have a number of rights in relation to your data including the right to object to the processing of your personal data where that processing is carried out for our legitimate interests.

1. Personal Data – what is it?

Personal data means data which relates to a living person who may be identified directly or indirectly from that data. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (“GDPR”). When you purchase a vehicle from us or where your vehicle is repaired or serviced by us Johnson & Perrott Ltd. are the data controllers. This means that we determine how your data is processed.

2. What categories of Personal Data are collected?

Johnson & Perrott Limited may collect different categories of personal data about you including but not limited to:

- The personal data collected by us in order for us to supply you with your vehicle, to enable us to repair or service your motor vehicle or where you lease a vehicle from us through your company or employer. This personal data includes but may not be limited to:
 - Identity Data such as name, address and title
 - Contact Data such as landline and mobile number, email address
 - Current vehicle details.
 - Transactions data including details of any previous transactions with Johnson & Perrott Ltd.
- The personal data collected by us from your interaction with our websites which may include but may not be limited to:
 - Identity Data such as name, address and title
 - Contact Data such as landline and mobile number, email address
 - Current vehicle details.
- In certain circumstances, where you wish for us to arrange third party finance on your behalf, sensitive or “special categories” of personal data may be processed by us. This data may include but may not be limited to:
 - Bank details
 - Income detailed
 - Employment details
 - Proof of address
 - Photo Identification

- Residential status

3. Legal basis for processing your data

We collect your Personal Data to enter into a contract with you to sell a motor vehicle to you, to purchase a motor vehicle from you by way of a trade in, to lease a vehicle to you through your company or employer and/or to repair or service your motor vehicle. If you do not provide us with the data we may not be able to perform our contract or perform our legal obligations. We will notify you of this at the time if this is the case.

We may also process your personal data for the purpose of our legitimate interests or those of a third party such as:

- To communicate with you for direct marketing purposes to make you aware of products and services which may interest you where you have not objected to us doing so. We may do this by phone, post, email, text or through other digital media.
- To communicate with you in relation to customer satisfaction surveys where you have not objected to us doing so. We may do this by phone, post, email, text or through other digital media.
- To communicate with the manufacturer of the vehicle you purchase and/or their appointed distributor in Ireland for the purposes of warranty, safety, recall and customer satisfaction surveys. With your consent we will also pass your personal data to the manufacturer of the vehicle you purchase and/or their appointed distributor in Ireland for direct marketing activities. The manufacturer and/or its appointed distributor may contact you separately about their use of your data.
- We may, with your consent, share your personal data with third party service providers that perform services and functions at our direction and on our behalf such as our third party warranty providers, providers of ancillary products for your motor vehicle (including but not limited to paint protection, alloy wheel protection and Gap Insurance)
- We may, with your consent, share your personal data with marketing companies who carry out marketing campaigns on our behalf.

Our legitimate interest in these instances is to develop relationships with our existing and potential customers and to assess our performance and standards.

Where you purchase a new vehicle or a used vehicle not previously registered in the State from us we will use your personal data to register the motor vehicle with the Revenue Commissioners to pay any VRT and VAT on the vehicle or, where applicable, to apply for a VRT, VAT and/or motor tax exemption on your behalf, as required by law. Where you purchase a used previously registered vehicle we will use your personal data to transfer the ownership of the vehicle to you as required by law.

We may also use your personal data to comply with any legal obligation under anti-money laundering legislation, for the purposes of any statutory audit or for any other legal obligation to which we are subject.

We may also use your personal data to manage our everyday business needs, including accounting and to prevent fraud. Where we do so we rely on the lawful processing ground of legitimate interest and our legitimate interest in this instance is in the effective management of our business.

We will only use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose please contact the Data Protection Leader using one of the contact details outlined at the end of this policy. If we need to use your personal data for an unrelated purpose we will notify you and we will explain the legal basis which allows us to do so.

4. Your data and Third Parties

We may share your personal data with third parties for the following purposes:

- **Manufacturer of your vehicle and their distributor.** We will pass your personal data on to the manufacturer of the vehicle you purchase and/or their appointed distributor in Ireland for the purposes of warranty, safety, recall and customer satisfaction surveys. If you consent we will also pass your personal data to the manufacturer of the vehicle and/or their appointed distributor in Ireland for marketing activities. The manufacturer of the vehicle and/or their appointed distributor in Ireland may contact you separately about their use of your personal data.
- **The Revenue Commissioners.** We may sometimes share your personal data where we perform the first registration of your motor vehicle or where we apply for from VRT, VAT and/or motor tax for you.
- **Third Party Service Advisors.** We may share your personal data with third party service advisors that perform services and functions at our direction and on our behalf such as our accountants, IT service providers, printers, lawyers and other business advisors, marketing companies who carry out marketing campaigns on our behalf and providers of security and administration services.
- **Potential Sale of the Business.** We may also share your personal data to companies we plan to merge with or be acquired by.
- **An Gardai, Government Bodies or officials.** We may share your personal data with An Gardai or other Government Bodies or agencies where required to do so by law.
- **Within our Company Group.** Where we form part of a company group we may share your personal data internally within the group for administration efficiencies.
- **Finance and Leasing Companies.** We may share your personal data with finance and leasing companies in order to obtain a finance quotation for you. In certain circumstances, where you wish for us to arrange third party finance on your behalf we may request, sensitive or “special categories” of personal data. This data may include but not be limited to Bank details, photo identification, and proof of address or other personal data as requested by the finance or leasing company.

- **Insurance Companies and Motor Assessors.** We may share your data to insurance companies and/or motor assessors appointed by you, a third party or an insurance company, where any portion of the costs of repairs or work being carried out by us is covered under an insurance policy.

Our websites may include links to third party websites and/or plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy policies. When you visit these third party websites we encourage you to read the privacy policy of applicable to these websites.

5. Data Retention

Your personal data shall be retained for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

6. Transfers outside of the European Economic Area

We may transfer your personal data outside of the European Economic Area. These countries do not always afford an equivalent level of privacy protection and in such circumstances we will take specific steps, in accordance with data protection law, to protect your personal data. In particular, for transfers of personal data, outside the EEA where there is no adequacy decision by the European Commission we may rely on contractual protections approved by the European Commission.

7. Your Rights

You have several rights under data protection law in relation to how we use your personal data. You have the right, free of charge, to:

- Request what type of personal data we hold about you and what we do with that data. You are also entitled to receive a copy of this data in a structured, commonly used and machine-readable format.
- Request that we rectify any inaccurate personal data we hold about you.
- Request that we erase personal data we hold about you.
- Request us to cease using your personal data in certain cases, including if you believe that the personal data we hold about you is inaccurate or our use of your data is unlawful. If you exercise this right, we will store your personal data and will not carry out any other processing until the issue is resolved;
- Object to us using your personal data where we rely on our legitimate interests to use your data. We will stop using your personal data unless we can demonstrate an overriding legitimate grounds for the continued processing of this data; and
- To have your personal data transmitted to another data controller.

These rights are in some circumstances limited by data protection legislation.

You can exercise these rights at any time by contacting the Data Protection Leader using the contact details set out below. We will endeavour to respond to your request within a month. If we are unable to deal with your request within a month we may extend this period by a further two months and we will explain why. If you are not satisfied with how your query or complaint has been resolved, you have the right to raise the matter with the Office of the Data Protection Commissioner (www.dataprotection.ie)

8. The security of your data

We have out in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Changes to the Privacy Policy and your duty to inform us of changes

Any changes we make to our Privacy Policy will be posted onto our website and will also be available at each of our business locations.

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.

For further data on data protection see www.dataprotection.ie

10. Contact Details

Company:	Johnson & Perrott Ltd.
Dealership Locations	Mahonpoint Retail Park, Douglas Rd., Bandon Rd.
Registered Address:	Johnson & Perrott Ltd., Mahonpoint Retail Park, Mahonpoint, Cork
Company Registration No:	3166
Website:	www.jpmsg.ie ; www.jpmahonpoint.ie ; www.jpdouglas.ie
Email:	reception@jpmahonpoint.ie
Phone:	021-4615200