

Mill Garages North East Limited Privacy Policy

1. General introduction

- 1.1. We are committed to ensuring that we manage your personal data professionally and in compliance with all applicable data protection laws. Part of this commitment is to ensure that there is transparency about how we process personal data. This policy includes an explanation of:
 - 1.1.1. what data we are processing;
 - 1.1.2. why we are processing it and what we do with it;
 - 1.1.3. whether we will share it with anyone else;
 - 1.1.4. whether we will transfer it outside of the European Economic Area ("EEA");
 - 1.1.5. how we keep your data safe; and
 - 1.1.6. your rights.
- 1.2. We hope that you find this Privacy Policy helpful. If you have any questions, please don't hesitate to contact us.

2. About us

- 2.1. Our company name is Mill Garages North East Limited and we are located at c/o Mill Garages, Scotswood Road, Newcastle Upon Tyne, Tyne & Wear, NE15 6BZ. In this policy we have referred to the Mill Garages North East Limited as: we, us, or Mill.
- 2.2. We also operate under the following trading names Mill Northeast, Mill Newcastle, Mill Stockton, Mill Sunderland, Mill Harrogate, Mill Business Sales, Volvo Cars Newcastle, Volvo Cars Stockton, Volvo Cars Sunderland, Volvo Cars Knaresborough, Volvo Cars Northeast and Mill Volvo.
- 2.3. For any queries concerning your data please contact the Data Protection Representative at the above postal address or by email at dataprotection@millnortheast.co.uk
- 2.4. We are a retailer of new and used vehicles, associated repair and maintenance services and parts and accessories.

3. Your personal data

- 3.1. We process your personal data if we understand that you may be interested in purchasing our products or services. In this section 3 we provide more detailed information about how we will manage your personal data.
- 3.2. **What data do we hold about you and how have we obtained this?**
 - 3.2.1. We will obtain information about you when you enquire about our products or services. Typically, the information that we obtain will be your contact details and payment information. If you choose to buy finance or insurance products from companies that partner with us, we will need more detailed information including, in some cases, identity and personal financial information.
 - 3.2.2. If you have visited our website we may automatically collect some personal information including: details of your browser and operating system, the website from which you visit our website, the pages that you visit on our website, the date of your visit, and the Internet protocol (IP) address assigned to you by your internet service. We collect some of this information using cookies – please see Cookies in Section 5 for further information. We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.
 - 3.2.3. Our telephone calls are recorded for training and quality control purposes and may also be used to verify any comments that were made during any conversation.
 - 3.2.4. We have CCTV in operation at each of our operations for security purposes. It is therefore possible that images of you will be recorded when visiting our sites.
 - 3.2.5. Sometimes you will have sent or given your information directly to us, but you may have provided your information to another party such as those Volvo group companies listed in section 3.4.1, vehicle finance companies, vehicle retail or comparator websites/ providers, brokers, vehicle fleet companies, Motability or third party sales platform providers e.g. ebay/Paypal where you have purchased goods who, in turn, has provided the information to us.

3.3. How do we use your personal data and what is the applicable lawful basis?

- 3.3.1. Where we are required to do so to perform **our contract** with you, we may process your information for negotiating or completing a sale of goods or services with you, completing warranty work or other aftersales obligations including the provision of breakdown and recovery services.
- 3.3.2. Where it is in your **vital interests**, we may use your information to organise or notify you about safety and product recall notices and to manage any resulting works.

- 3.3.3. We may process your information to comply with **legal obligations** including assisting HMRC, the Police and the Driver and Vehicle Licensing Agency.
- 3.3.4. We may process your information to allow us to pursue our **legitimate interests** including for:
 - 3.3.4.1. providing you with marketing information about our products and services or the products and services of our selected partners. In addition, we will keep you informed of events that we think will be of interest to you;
 - 3.3.4.2. analysing our performance to further improve our customer services;
 - 3.3.4.3. market research, training and to administer our websites;
 - 3.3.4.4. the prevention of fraud or other criminal acts;
 - 3.3.4.5. undertaking credit checks for finance;
 - 3.3.4.6. complying with requests from you including if you exercise any of your rights noted in this Privacy Policy;
 - 3.3.4.7. the purpose of corporate restructure or reorganisation or sale of our business or assets;
 - 3.3.4.8. enforcing our legal rights or to defend legal proceedings and for general administration purposes.

3.4. Will we share your personal data with any third parties?

- 3.4.1. We may share your data with Volvo Cars UK Limited, Volvo Car Financial Services Limited and other companies within our group as set out in section 2.2.
- 3.4.2. We may disclose your information to our third-party service providers for the purposes of providing services to us or directly to you on our behalf e.g. advertising agencies or administrative service providers. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.
- 3.4.3. If we sell all or part of our business to a third party, we may transfer your information to that party to ensure that it can continue to provide information that you have requested or for any of the other purposes that we have noted above.
- 3.4.4. We may transfer your data to government or other official bodies for the purposes of complying with legal obligations, for enforcing our rights, or for the prevention or detection of a crime.

3.5. How long do we keep your data?

- 3.5.1.1. If you have expressed an interest in buying products or services from us or from our selected partners, we will retain your contact details and related information concerning your enquiry for 3 years from the date that we last had contact with you for marketing purposes.
- 3.5.1.2. If you have purchased products or services from us, your personal data will be retained by us for marketing purposes for a period of 6 years from the date of your last purchase or where you have unsubscribed from further marketing from the time that we receive your request.
- 3.5.1.3. If you have purchased goods or services from us or from our selected partners, we will keep the data relating to that purchase (e.g. order forms and invoices and related correspondence) for up to 7 years from the date of the contract.
- 3.5.1.4. Where we have issued a product recall notice relevant to your vehicle we will retain your data for a period of 10 years from the date of the notice.
- 3.5.1.5. Voice recordings of telephone calls and CCTV images are retained for 90 days and 30 days respectively.
- 3.5.1.6. If you have requested that we do not send you marketing information we will always retain sufficient information to ensure that we remember to comply with your request.
- 3.5.1.7. If you have purchased insurance products or financial products from our selected partners then we may retain your personal data for up to 12 years to verify that we have complied with the relevant regulations in relation to those products.
- 3.5.1.8. The periods stated in this section 3.5 may be extended if we are required by law to keep your data for a longer period.

4. Transferring your data outside of the European Economic Area (“EEA”)

- 4.1.1. The information that you send to us may be transferred to countries outside of the EEA. By way of example, this may happen where the Volvo group companies are incorporated in a country outside of the EEA or if any of our servers or those of our third-party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the EEA.
- 4.1.2. If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected. These measures

include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection.

4.1.3. If you use our services whilst you are outside the EEA, your information may be transferred outside the EEA to provide you with those services.

5. Cookies

- 5.1. We use Cookies on our website. A cookie is a small text file which is placed onto your computer (or other electronic device) when you visit our website. This enables us to monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of your internet service provider.
- 5.2. You can find out more about the Cookies we use in our [Cookie Policy](#) available on the home page of our website.
- 5.3. You can set your browser not to accept cookies, however some of our website features may not function as a result.
- 5.4. For more information about cookies generally and how to disable them you can visit: www.allaboutcookies.org

6. Data security

- 6.1. We have adopted the technical and organisational measures necessary to ensure the security of the personal data we collect, use and maintain, and prevent their alteration, loss, unauthorised processing or access, having regard to the state of the art, the nature, scope, context and purposes of processing of the data stored and the risks to which they are exposed by human action or physical or natural environment. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database.
- 6.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access

7. Links to other websites

- 7.1. Our website may contain links to and from other websites (e.g. social media sites such as Twitter, Flickr, YouTube and Facebook). Unless we own such websites, we accept no responsibility for the way in which they process your personal data. You are recommended to check the privacy policy of each website before you submit any personal data to it.

8. Social Plugins

- 8.1. We use so-called social plugins (buttons) of social networks such as Facebook, Google+ and Twitter.
- 8.2. When you visit our websites, these buttons are deactivated by default, i.e. without your intervention they will not send any data to the respective social networks. Before you can use these buttons, you must activate them by clicking on them. They then remain active until you deactivate them again or delete your cookies. Please see section 5 for further details regarding our use of cookies.
- 8.3. After their activation, a direct link to the server of the respective social network is established. The contents of the button are then transmitted from the social network directly to your browser and incorporated in the website.
- 8.4. After activation of a button, the social network can retrieve data, independently of whether you interact with the button or not. If you are logged on to a social network, the network can assign your visit to the website to your user account.
- 8.5. If you are a member of a social network and do not wish it to combine data retrieved from your visit to our websites with your membership data, you must log out from the social network concerned before activating the buttons.
- 8.6. We have no influence on the scope of data that is collected by the social networks through their buttons. The data use policies of the social networks provide information on the purpose and extent of the data that they collect, how this data is processed and used, the rights available to you and the settings that you can use to protect your privacy.

9. Your rights

9.1. Your right to access data

- 9.1.1. We always aim to be as open as we can and allow people access to their personal information. Where we hold your personal data, you can make a 'subject access request' to us and we will provide you with:
 - 9.1.1.1. a description of it;
 - 9.1.1.2. an explanation of why we are holding it;
 - 9.1.1.3. information about who it could be disclosed to; and
 - 9.1.1.4. a copy of the information in an intelligible form – unless an exception to the disclosure requirements is applicable.
- 9.1.2. If you would like to make a 'subject access request' please make it in writing to our contact email address noted in section 2 and mark it clearly as 'Subject Access Request'.

9.1.3. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

9.1.4. Unless you agree a different time, we will complete your subject access request within one month.

9.2. Right to stop marketing messages

9.2.1. You always have the right to stop marketing messages. We will usually include an unsubscribe button in any marketing emails and a stop message option for any texts. If you do wish to unsubscribe, please just respond to the text appropriately or click the unsubscribe button and we will promptly action any request you make there. You may also ask us to stop marketing messages during any other communications with us either when you visit us or when we telephone you. Alternatively, you can update your marketing preferences by contacting us at any-time. Our contact details are shown in section 2.

9.3. Right to be forgotten

9.3.1. If we hold personal data about you, but it is no longer necessary for the purposes that it was collected and cannot otherwise be justified – you have the right to request that we delete the data.

9.4. Right to restrict data

9.4.1. If we hold personal data about you and you believe it is inaccurate you have the right to request us to restrict the data until it is verified. You also have the right to request that the data is restricted where you have a right to it being deleted but would prefer that it is restricted.

9.5. Transferring your personal data

9.5.1. Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under Section 4 How we use your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form.

9.5.2. You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information

9.6. Right to complain

9.6.1 You always have the right to complain to the personal data regulator, the [ICO](#).

10. Policy updates

10.1 This policy was last updated on 23rd May 2018.