

Evans Halshaw Privacy Policy

Evans Halshaw is a trading name of the Pendragon PLC and its subsidiaries (collectively referred to as “Evans Halshaw”, “we” or “us” in this policy).

Overview

Maintaining the security of your data and ensuring that you are in control of how your data is handled is a priority at Evans Halshaw. We are dedicated to ensuring that we are transparent about the data that we collect about you, how we use it and the conditions whereby we may disclose your data to others. We will ensure that your data is kept secure and that you are aware of the steps we have taken to ensure the security of your private information.

Evans Halshaw takes the security of your data very seriously and strictly adheres to guidelines published in the United Kingdom Data Protection Act 1998 and the General Data Protection Regulation 2016/679 which is applicable from 25th May 2018. Any questions relating to this policy and our privacy practices should be sent to dataprotection@evanshalshaw.com

This policy applies whether you visit one of our dealerships or our website, and aims to provide you with information about:

- Personal data we collect
- How we may use your personal data
- Your legal rights relating to your personal data

Personal data we collect

We will only collect relevant data to enable us to carry out the service you have requested or accessed, below we have set out in more detail about the personal data we collect and why we collect it. We review our retention periods regularly and will only hold your data for as long as it is necessary for the original purpose it was collected for, as required by law or as set out in any relevant contract we have with you.

Service Booking

To make an online vehicle service or MOT booking via www.evanshalshaw.com or over the phone, we require your name, contact information and vehicle details. This information is required so that we can arrange your booking for you at your chosen dealer and send you your booking confirmation through your preferred contact method (email or SMS).

If you have purchased a vehicle from Evans Halshaw or you have previously had a service at one of our dealerships our aftersales system will have stored your information, along with your service and MOT due date. We will send you our yearly service/MOT reminder as we feel it will be in your Legitimate Interest to know when these events occur. You can object to receiving these reminders at any time.

As an existing customer, should you choose to book your next service via our service reminder we may use a cookie to pre-populate your details to avoid you having to type in details on subsequent visits.

If you do not visit our dealership for more than 26 months, your details will be deleted for marketing purposes but may be retained for Contractual Obligation had you purchased your vehicle from us within the last 7 years.

Vehicle Search

When you search for a new or used vehicle on our website we may store information on the vehicles you searched for and viewed in a cookie so that we can provide personalised content, and suggest other vehicles you may also be interested in.

Online Enquiry

If you enquire about one of our vehicles we require your name, email address and contact telephone number to able us to respond to your enquiry. We also request your postcode to enable us to send your enquiry to your nearest Evans Halshaw dealership. We will continue to discuss your enquiry with you for up to 6 months after your initial enquiry or if applicable, the new vehicle you enquired about becomes available (whichever is greater).

Test Drive or Courtesy Car

If you book a test drive or take a courtesy car from our service department we require a copy of your driving licence, we will store a copy of this in case of any speeding, parking or other motoring offence that may occur.

Move me closer

If you request to move a vehicle to your nearest Evans Halshaw dealership via our Move me Closer service we will require your name, email address and contact telephone number. We will contact you to arrange and confirm the transfer of your chosen vehicle to your selected dealer. A soft credit search may be carried out prior to confirmation of your Move Me Closer request. Our soft credit search will not leave a footprint on your credit history and will not impact your credit rating.

Sell your car

If you request a valuation for your current vehicle we require your vehicle details including registration number, mileage, plus your name, email address and telephone number so that we can send you your indicative valuation. If you decided not to proceed with your valuation we will delete your details within 4 weeks after the expiration of your valuation.

Vehicle Purchase

If you decide to purchase a vehicle from Evans Halshaw, at the point of sale under a Contractual Obligation we will collect your full name, address, contact number, date of birth, driving licence details, payment details, details of the vehicle you are buying and, if applicable, details of the vehicle you will be using as a part exchange. Your details will not be used for marketing purposes unless you provide consent for us to do so. If you purchase a new vehicle we will be Contractually Obligated to send your details to the manufacturer for warranty, registration and recall purposes.

Vehicle Finance

If you require finance for your vehicle purchase, we will require additional information including marital and housing status, number of dependents, previous address, occupation, employer, business address and bank details, in addition we will also require proof of address (i.e. utility bill) and any other relevant information. With your permission this information will be passed to our selected finance partners. Your personal information will be stored within your deal file which will be stored for 7 years. At the end of your finance agreement we will contact you to discuss your end of finance arrangements and where applicable arrange the required arrangements to fulfil the contract – for example end of finance term vehicle return and appraisal.

In Dealership Visit

We operate CCTV in all of our dealerships to monitor our premises, therefore your image and vehicle registration may be captured and stored for up to 30 days.

Competitions

If you enter one of our competitions, we require your name, email address and telephone number so that we can contact the winner. Competitions are subject to the following terms and conditions

1. Competitions are open to all UK residents aged 21 and over.
2. A fully completed entry form must be placed in the entry box along with the answer to the entry question, location of which can be found within the specific competition terms and conditions.
3. Entry into the Prize Draw will be deemed to imply acceptance of the Terms and Conditions.
4. There will be no cash alternative to the Prize.
5. Only one entry per person will be accepted.
6. Incomplete, damaged or illegible entries will not be accepted.
7. The draw will take place on the date specified within the competitions terms and conditions under independent supervision and the winner will be the first name drawn.
8. The winner of the Prize will be notified in writing as soon as possible.
9. The winner's name and county will be available by sending a stamped addressed envelope to the address below.
10. Evans Halshaw the right to substitute an alternative prize should they deem it necessary PROVIDED always that any substituted prize shall be of no less value than the original prize.
11. If Evans Halshaw is prevented from completing the Competition by reason of any circumstances beyond its control, Evans Halshaw shall under no circumstances be liable to any party whatsoever.

12. No one connected with the Competition or its sponsor Pendragon PLC trading as Evans Halshaw is eligible for entry.
13. No correspondence will be entered into.
14. Winners may upon reasonable notice being given be required by Evans Halshaw to participate in any publicity concerning the competition, such publicity to include but not be limited to participation in photographs.
15. No purchase is necessary.

Contact by phone

Should you call one of our dealerships or should we contact you in response to an enquiry, your phone call may be recorded and will be retained for a maximum of 3 months. The recording will be used for quality and training purposes only.

How we may use your personal data

Where you have provided Consent;

Evans Halshaw uses your personal data for electronic marketing purposes and we may contact you to update you in accordance with your selected marketing preferences.

- via email, text message, post or telephone with offers, services and other related products.

You have the right to opt out of receiving promotional communication at any time by;

1. Changing your marketing preference by selecting the 'amend my preferences' link located at the bottom of each of our emails.
2. Text STOP in response to a text message
3. Contacting Evans Halshaw via the contact details set out in this policy

Where there is a Legitimate Interest;

We may use and process your personal information where it is necessary for us to pursue our Legitimate Interest as a business for the following purposes;

Automated Processing

When visiting our website, we may collect data directly from you as set out in this policy, as well as analysing your browsing and purchasing activity, both online and in dealership, along with your previous response to marketing communications. The results of this data (collected by Cookies) allow us to ensure that we contact you with information on products and offers that are relevant to you. To do so, we use automated profiling software.

Evans Halshaw recommend that you accept cookies for the following reasons;

1. They enable us to customise elements of our websites for you to provide you with relevant content and offers based on your previous browsing history.
2. We are able to recognise how many users are accessing our website so that we can ensure we have enough capacity and that our pages load within an acceptable time for visitors.
3. It helps us to identify errors with the website and resolve them effectively.
4. They allow us to collect statistical, anonymous information about how our visitors browse our site so that we can improve customer experience.
5. It informs us which sections of our site are the most popular and how we can improve those that do not perform well.

Website Banner Marketing

If you visit our website, you may receive personalised banner advertisements whilst browsing other websites including but not limited to search engines and social networking. Any banner advertisement you will see will relate to products you have viewed whilst browsing our website on your computer or other devices.

These advertisements are provided by Evans Halshaw using 'Cookies' placed on your computer or other device. You can remove or disable cookies at any time – see our cookies policy for more information.

Social Media

You may receive advertising based on information about you that we have provided to the social media platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it receives from us.

For the Prevention of fraud and other criminal activities

To undertake credit checks for finance

To correspond and communicate with you

To comply with a request from you in connection with the exercise of your rights

For example – where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression list in order to be able to comply with your request)

For accuracy of data

In order to keep our data up to date and accurate improvements made be made to our database e.g. by consolidating records we hold about you.

General Administration

We may need to process your data to manage your queries, complaints, or claims and may result in us contacting you by the contact details you have previously provided.

Where required to perform a Contract with you;

We may use and process your personal data where it is necessary for the performance of a contract with you or in order to take steps at your request before entering into a contract with you including for the following purposes;

- To exchange information for warranty/ aftersales to the relevant manufacturer of your vehicle.
- The purchase of a vehicle

Where it is in your Vital Interest;

We may use your personal information to contact you if there are urgent safety or product recall notices to communicate to you or where we otherwise reasonably believe that the processing of your personal information may prevent or reduce any potential harm to you.

Where required to comply with our Legal Obligation;

We will use your personal data to comply with our Legal Obligation including: (i) to assist HMRC, the Police, the Driver and Vehicle Licensing Agency (DVLA) or any other public authority or criminal investigation body; (ii) to identify you when you contact us; and (iii) to verify the accuracy of data that we hold about you.

Cookies

We use cookies to enhance the experience for visitors to our website. Cookies are small files which help us to track and identify visitor preferences which enable us to deliver relevant content and help visitors navigate the website.

The cookies that we use do not store any confidential information about you. You may wish to disable these cookies however disabling these cookies may prevent you from using certain parts of Evanshalshaw.com website efficiently. The following are the third-party cookies we use on Evanshalshaw.com

Cookie name	Description/Purpose	Cookie category/type of	Expiry date
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		use	
Google analytics - _ga - _gid - _gat	This cookie enables Evans Halshaw to distinguish users - Distinguish users - Distinguish users - Throttle request rate	Tracking / Marketing	- 2 years - 24 hours - 1 minute
Adwords conversion tracking _gac_<property-id>	This cookie enables Evanshalshaw to discover what happens after a vistior clicks on one of our ads.	Marketing	
Adwords Remarketing _gac_<property-id>	This cookie uses tags to serve ads based on a visitor's past visits to the Evanshalshaw website.	Marketing	
Facebook cookie	This cookie makes it possible to send data to Facebook. Further information on the use of cookies and how they can be handled is available on the Facebook website. https://developers.facebook.com/docs/facebook-pixel	Marketing	Session
	These cookies record the time and date a specific page was viewed online. It can also supply various details relating to the user such as IP address, referring sites and browser information.	Marketing	Session
DoubleClick Cookie _dc_gtm	Used to help identify the visitors by either age, gender, or interests by DoubleClick - Google Tag Manager.	Marketing	
Google tag manager _gtm	Google Tag Manager (GTM), which means that GA was not integrated directly but injected via GTM	Marketing	
ASP.Net_SessionID	This is used by the by the servers to identify an individual web session on the site and keep them unique.	Necessary	Session
Campaign	Stores the details of the marketing campaign that resulted in the website visit i.e. what advert or link was used to trigger the visit	Marketing	Session
DefaultSettings	Stores a visitor's search preferences such as sort order	Functional	
Finance	Stores a visitor's preferences if using vehicle search for finance quotes. This prevents a user from having to persistently enter the same details	Functional	
LastClickedID	Stores the detail of which vehicle was clicked to allow the user to be taken back to the correct place if they choose to 'go back' in the browser	Functional	
Latitude	Used to identify location, if geo-location is enabled in the browser	Functional	
Longitude	Used to identify location, if geo-location is enabled in the browser	Functional	

Privacy	Stores whether the user has accepted the cookie policy	Functional	
Page	Stores the page number the user has viewed within a list of vehicle results	Functional	
PostcodeExists	Stores whether the user as entered their postcode – this allows the website to determine whether to enable certain functionality that requires a postcode	Functional	
TileView	Stores a user’s preference if using the vehicle search and determines what type of view to use when presenting vehicle details.	Functional	
UsersPostcode	Stores a user’s postcode. This enables certain functionality such as finding nearest dealer or vehicles.	Functional	
VehicleFilters	This cookie stores details of filters used within a vehicle search and allows the search filters to be maintained as a user pages through the results.	Functional	

How to disable cookies?

You may wish to disable these cookies however disabling these cookies may prevent you from using certain parts of Evanshalshaw.com website efficiently. However if you wish to learn more about the cookie settings for your browser, please select the links below:

- [Internet Explorer](#)
- [Firefox](#)
- [Chrome](#)
- [Safari](#)
- [iOS.](#)

To learn more on how Google & Facebook cookies work on websites, please visit:

- Google analytics: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
- DoubleClick: <https://support.google.com/dcm/partner/answer/2839090?hl=en>
- Facebook pixel: <https://developers.facebook.com/docs/facebook-pixel>

Collection of general data and information

Our website collects a series of general data. This general data and information is stored in the server log files. General day includes (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using general data and information, we do not draw any conclusions about visitors. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimise the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, we only analyse anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by individuals.

Sharing Data with third parties

In order to make certain services available to you, we may disclose your personal information to third parties. We will only disclose the minimum amount of personal data in order to provide the service. We have data sharing agreements in place with each of our third-party suppliers and have completed the necessary security checks to ensure that your data is kept safe once it is passed to them. Our third-party suppliers only have the rights to use your data for the purpose of fulfilling the service required of them, they do not have marketing rights over your data, unless you have specifically expressed third party consent. Your data will be shared with third parties under the following circumstances;

- If your enquiry leads to the purchase of a new vehicle your information will be shared with the relevant manufacturer for warranty, registration and safety recall purposes. We will ask for your consent to pass your information to the manufacturer for marketing purposes. We recommend that you read the manufacturers privacy policy to see how they will use your data.
- If your enquiry leads to the purchase of a vehicle with a finance agreement, we will disclose your information to our selected finance partners. If you are accepted for finance, the finance company will become the data controller for your information and we recommend that you read their privacy policy to see how they will use your data.
- If we provide you with a Service Plan/ Service Bundle quote we will disclose your information to our Service Plan partner, EMAC. If you decide to purchase a Service Plan/ Service Bundle from us EMAC will act as a Data Processor on our behalf. If you decide not to proceed with your Service Plan / Service Bundle quote your details will be deleted from EMAC within 4 weeks.
- To ensure that the data we hold remains up to date our databases are cleansed via Experian every XX weeks. If we are notified that you are no longer the registered owner of the vehicle we once attributed to you, the vehicle will be detached from your records.

Comment [DB1]: Might we not ask for consent for vm's for example to market?

Marketing

When you provide us with your personal data we may ask you to set your marketing preferences with us so that you can choose (if any) the information you'd like to hear more about as set out in the 'When Consent is required' section. This may be done by

- Registering for offers via our website; or
- Visiting one of our dealerships / contacting us via telephone

If you opt-in to receive marketing from manufacturers, we recommend that you read their privacy policy to see how they will use your data and how to alter your marketing preferences with them should you wish to in the future.

From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you consent to continue receiving marketing information from us.

Your Rights

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for your information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where no such information is required, after we have received your request.

Accessing your personal information

You have the right to ask for a copy of the information we hold about you by emailing or writing to us at the end of this policy. This will be provided in a readable format (CSV) free of charge. We may not provide you with a copy of your information if this concerns other individuals or we have another lawful reason to withhold that information.

Correcting and updating your personal information

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information we hold about you. In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold about you is inaccurate or out of date, please let us know by contacting us via the details at the end of this policy.

Withdrawing your consent

Where we rely on your consent as the legal basis for processing your personal information, as set out under 'How we use your personal data' section, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can also do this by selecting the 'amend my preferences' link located at the bottom of our emails. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

Objecting to our use of automated processing

You may contest to a decision made about you based on automated processing by contacting us on the details at the end of this policy.

Erasing your personal information or restricting its processing

In certain circumstances, you may ask for your personal data to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal data in the following situations;

- Where you believe it is unlawful for us to do so,
- You have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.

In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company in connection with legal proceedings.

Transferring your personal information;

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 'How we use your personal data' 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 CSV file.

We may not provide you / transfer you a copy of your data if this concerns other individuals or we have another lawful reason to withhold that information.

Complaining to the UK data protection regulator;

You have the right to complain to the Information Commissioners Officer (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO website for further details.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

By email: dataprotection@evanshalshaw.com

Or write to us at: Data Protection Officer, Evans Halshaw, Loxley House, 2 Oakwood Court, Little Oak Drive, Annesley, Nottinghamshire NG15 ODR.

Changes to your Privacy & Cookies Policy

Any changes we make to our privacy policy in the future will be published on this page and, where appropriate, notified to you by email.

This policy was last updated: