

Heatons Truck Group Privacy Notice

The Heatons Truck Group (Heatons), comprises of four businesses trading in the North West of England, Woodward's TVC, North West Trucks North West Truck & Trailer Parts and Heatons Truck & Trailer Parts together referred to as Heatons, we, our or the company throughout this notice.

This notice covers the specific personal data that Heatons collect and process to manage the business relationship we have with customers and suppliers.

Heatons is a "data controller" this means we are responsible for deciding how we hold and use your personal information.

We will update this policy from time to time; these up-dates will be posted on the Heatons websites.

Heatons are fully committed to comply with all applicable laws and regulations that relate to data protection including the General Data Protection Regulation (GDPR) and its principles.

These principles are that the personal information we hold about you, must be:-

- Processed lawfully, fairly and in a transparent manner
- Collected only for specified and valid purposes, that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Adequate Relevant to the purposes and limited to what is necessary (Data minimization)
- Accurate and kept up to date
- Kept only as long as necessary to fulfil the purposes we have told you about.
- Kept securely

This Privacy Notice will explain

- a) The personal data that we collect about you
- b) How we use your personal data
- c) How we collect your personal data
- d) Who we share your personal data with
- e) Your legal rights
- f) How long do we keep your personal data?
- g) How we protect your personal data
- h) CCTV monitoring
- i) How to Contact us

a) Your personal data that we collect about you

Personal Data means any information about an individual from which that person can be identified.

It does not include data where the identity has been removed (anonymous data)

The information we collect is relevant within the context of supplying a new or Used Truck, products through our parts departments and/or a range of repair and maintenance jobs that are available through our truck servicing operations.

We only collect information that is adequate and is limited to what is necessary.

We collect store and transfer different kinds of personal data about you these include:

Identity Data Includes name, job title and date.

Contact Data Includes billing address, home address, telephone number/s email address

Financial Data Includes payment card details; where you or your business has to apply for an account with us, Payment details and information held by credit reference companies and Companies House.

Mandatory Information includes information required by VOSA for HGV Testing, when we register a vehicle on your behalf with the DVLA, Driving licence details when you utilize our Demonstration fleet

Transaction Data includes details about you/your business trading history and trends, purchases and orders made by you; including payments from you/your business. Vehicle information including registration and/or chassis number, fleet size, mileage and warranty repair information.

Profile Data includes products/services provided to you feedback and customer satisfaction questionnaire responses, correspondence and communications.

Marketing & Communication Data includes your preferences as to whether you are happy to receive marketing material from us and our franchised Partner.

Usage Data includes information about how you use our website, products and services

Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Monitoring Data includes footage captured on CCTV at our sites

Special Category Data and Criminal Data

We may obtain information about criminal convictions and offences (e.g. obtained in the course of credit referencing or fraud prevention checks). Whilst not classed as “special category” data we may also obtain information about County Court or High Court judgements.

We also collect **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

If you fail to provide personal data Where we need to collect personal data by law, under the terms of a contract we have with you or for another lawful reason and you fail to provide that data, we may not be able to fully perform our obligations in accordance with our contract, provide you with the information you may require or otherwise properly deal with your request.

b) How we use your personal data

We will only process your personal data that is necessary for the purpose for which it has been collected.

You will always have the option not to receive marketing communications from us and you can withdraw your consent or object at any time.

We will never send you unsolicited “junk” email or via other communication, or share your personal data with anyone who might.

We will only use your personal information if we have a proper and lawful reason for doing so.

The lawful basis that can be used to process your personal information is: -

Consent - Contractual performance - Legal obligation - Vital interests - Legitimate interests

We may use more than one lawful basis to process your personal information. This will depend on the specific purpose for which we are using your data.

Legal Obligation

We will use your personal information to comply with a legal or regulatory obligation.

Examples: To register your truck with the DVLA to assist HMRC, the Police or any other public authority or criminal investigation body;

“Special category” data where it is necessary for the establishment, exercise or defence of legal claims. Where it is necessary to protect your or another individuals vital interests.

Vital Interests

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

Contractual performance

This lawful will be used for our customers where we have a relevant relationship and a Contractual Obligation. Alternatively, when we take the first step towards having a contract with you, such as preparing a quotation.

Including but not limited to service and repair and maintenance contracts with/or without extended warranty, a parts pricing contract or a vehicle sales quotation.

We process personal data to assist to in arranging vehicle finance through a vehicle finance company. This data forms part of the initial step taken with a view to you entering into a finance arrangement with the finance company.

Legitimate Interest

Will be used for processing personal data of our existing customers who have a relevant relationship with us.

A relevant relationship means a purchaser of a new or used truck and/or an account holder facilitating credit for the purchase of parts and the use of Heatons repair and maintenance facilities.

Existing New and Used Truck Customers	Legitimate Interest (Purchased up to 5 years ago)
Existing Truck Parts Customers	Legitimate Interest (Purchased up to 2 years ago)
Existing Truck Service Customers (No Contract)	Legitimate Interest (Purchased up to 2 years ago)
MOT	Legitimate Interest

When we refer to legitimate interests, we mean the interest of our business in managing our business to enable us to provide you with the best service and product.

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 do so by law).

The use of your personal data in this case will include for example

Supplying a new or used trucks, a truck part or to provide a service through our repair and maintenance facilities.

Maintain our records/systems with personal data and vehicle information to know and understand the history of our relationship.

To provide information on products or services. Periodically we send out marketing and promotional material by email but more generally via mail drops. These communications may include information on both new and existing products, brochures, special offers, prize promotions and invites to an event. All of which will be seen to be of benefit to our customers.

You can ask us to stop sending you marketing material at any time. If you wish to do so the details are provided in the final section of this notice.

Consent

For organizations who do not have a relevant relationship with us will receive marketing communications if your consent has been provided to be included on our marketing database.

If you provide us with your information for processing under Consent, We will only share your personal data for the marketing purposes in accordance with your consent. Generally, we would only wish to pass your information to our franchised partner/s.

Decision Making

Automated decision - making takes place when an electronic personal information to make decisions without humane intervention. We do not undertake automated decision-making using your personal data.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

c) How we collect your personal data

We use different methods to collect personal data from and about you. These include

Direct Interactions

You may provide Identity, Contact, Financial, Transaction, Profile, Mandatory and other data through face to face meeting/s, form filling or by corresponding with us by post, phone, email, text message, via our website, social media or otherwise .

The personal data you provide when you or your business apply to become an account holder for the purchase of parts and the provision of vehicle repair & maintenance

Purchase a new or used truck

Purchase a part or a vehicle repair/ service on a “cash sale basis”
Request a quotation on a new or used truck.
Request promotional or marketing information to be sent to your business

Third parties

We may receive personal data about you from various third parties and public sources including Credit reference agencies such as Experian. When your business applies to hold a trading account with us, we will normally make searches about you with Experian. Experian will provide to us information about your business, including information on the stakeholders within the company and the financial and trading history. Should it become necessary to review an account, a further check with Experian will be made. The ways in which Experian use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>.

Processors

We appoint will only process your personal data on our instructions that are subject to a duty of confidentiality

Our Suppliers

In particular, Daf Trucks our franchised partner who may ask us to contact you following a request by you to do so. Or they may ask us to supply you with documentation regarding a purchase of their product or important technical/safety data.

Public Sources

We may receive personal data for example, from Companies House or the Electoral Register.

Technical Data

From analytics providers such as Google

Automated technologies or interactions

As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns.

We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy above.

Cookies

Heaton's Truck Group does NOT use cookies to record the preferences of visitors, to enable us to optimize the design of our website.

Cookies are data sent from a website and stored on your device or web browser. They ease navigation, and increase the user-friendliness of a website.

In response to the EU Cookies Directive – effective May 26th 2012, we should make you aware that most browsers automatically accept cookies. You can prevent cookies from being stored on your hard drive by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your hard drive at any time. If you choose not to accept cookies, you can still visit our website; however, this may result in a reduced availability of the services provided.

We would also like visitors to be aware we use a third party Analytical company to collect details of visits to our websites for statistical analysis. We can assure you that we do not share this information with any third parties.

d) Who we share your personal data with

We take steps to ensure that any of our third party providers, who handle your information, comply with data protection legislation and protect your information in the same manner as we do. We do not sell your personal information to third parties.

We may need to share your personal data as is necessary to enable us to complete a transaction agreed with you to provide goods and/ or services you have requested or authorised.

We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where necessary we share your information with various parties and for the reasons as listed below.

Employees within the Heaton's Truck Group that have a need for such access for the purpose for which it was collected. Including those involved in account management (including credit accounts) analysis, reporting and to manage the delivery of goods

Where we are under a legal duty to do so in order to comply with any legal obligation.

This may include official bodies such as the FCA (Financial Conduct Authority). The Information Commissioner's Office (ICO) the Trading Standards Service and HM Revenue and Customs or other applicable regulatory, compliance, governmental or law enforcement agency. If necessary in connection with legal proceedings or potential legal proceedings;

External Third Parties, including

Our franchised partner/s the manufacturer of the Trucks we sell and the supplier of the majority of parts we sell.

Professional Advisors. Including Lawyers, Banks, BSI/ISO accreditation, Health & Safety, Auditors and Insurers.

Third Party suppliers and sub contractors including bodybuilders, delivery agents, paint sprayers, sign writers, recovery services, tyre fitting, telematics, CCTV and in-vehicle monitoring, the provision of hosting or other I. T. services including our automotive dealer management software system.

Third Party Entities involved in credit checking, anti fraud activities, crime prevention /detection, risk assessment and management and dispute resolution.

Third Parties whom we may choose to sell transfer or merge parts of our business, including the assets. Alternatively we may seek to purchase a business or merge with another business. If changes in this order were to happen to our business, the new owners may use your personal data as set out in this privacy notice.

e) Your legal rights

Fairness and Transparency

Under certain circumstances, you have rights under data protection legislation in relation to your personal data as listed below.

You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive, alternatively, in these circumstances, we may refuse to comply with your request.

We may need to ask for proof of your identity before we can respond to your request.

We try to respond to your request within one month, should this take longer we will keep you updated.

Request access This enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it.

Request correction This enables you to have any incomplete or inaccurate data we hold about you corrected.

Request erasure This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.

Object to processing Of your personal data where we are relying on our legitimate interest (or that of a third party) To do so on the grounds that is likely to cause, or is causing damage or distress and/or it impacts on your fundamental rights and freedoms.

You also have the right to object if we were processing your personal data for direct marketing purposes.

Request a data transfer

We will provide to you, or your chosen third party, your personal data in a structured, commonly used, machine-readable format (known as "data portability). This only applies to automated information which you provided consent for us to use or necessary to perform a contract with you.

Request restriction of processing

You can ask us to suspend the processing of your personal data in the following circumstances:

- A) You want us to establish the data's accuracy.
- B) Our data use is unlawful but you do not want us to erase it;
- C) You need us to hold the data even if we no longer need it, to establish, exercise or defend legal claims;
- D) You have objected to our use of data but we need to verify whether we have overriding legitimate grounds to use it

Withdraw consent at any time

Where we rely on consent to process your personal data. This will not affect the lawfulness of processing carried out before you withdraw your consent.

f) How long do we keep your personal information?

We are required by law to keep your personal information only for as long as is necessary for the purposes for which we are using it. The period for which we keep your personal information will be determined by a number of criteria, including the purposes for which we are using the information, the amount and sensitivity of the information, the potential risk from any unauthorised use or disclosure of the information, and our legal and regulatory obligations.

g) How we protect your personal information.

We have put in place appropriate security measures in order 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 personal data to those employees, agents, contractors and other third parties who have a business need to know. .

We have put in place procedures to deal with any suspected personal data breach and will notify any affected individuals of a breach if we have suffered a theft, destruction or other loss of their personal data as soon as the facts are fully known. We will co-operate fully with any applicable regulator where we are legally required to do so.

h) CCTV monitoring

For the greater security of our customers and staff, and to prevent and detect crime, we operate CCTV in and around our sites. As a consequence, your image and vehicle registration may be captured and stored for up to 30 days.

i) How to contact us

Should you have any specific data protection concerns, wish to make a request to exercise your legal rights set out in this privacy policy or to make a complaint. We request you contact us in writing: -

The Compliance Officer Heatons Truck Group, Griffiths Road, Lostock Gralam, Northwich, Cheshire, CW9 7N
Alternatively Email; complianceofficer@northwesttrucks.co.uk

This does not affect your right to complain to the data protection regulator in the UK.

Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF www.ico.org.uk.
However should you have any issues or are unclear as to how we handle your personal data we would appreciate that you contact us in the first instance.

Woodwards TVC and Heatons Truck & Trailer Parts are Divisions of Heatons Truck Group Ltd.

North West Trucks North West Truck and Trailer Parts are Divisions of North West Truck Services Ltd

North West Truck Services Ltd Reg. No 2147882 England is a wholly owned subsidiary of Heatons Truck Group Ltd Reg. No.00487572

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