

Privacy Statement

Fish Brothers a trading names of Fish Brothers (Swindon) Ltd are committed to protecting and respecting any personal information you share with us.

This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

We will always give you the option not to receive marketing communications from us. We will never send you unsolicited 'junk' email or communications or share your data with anyone else who might. We do not sell your information to third parties, but we do work closely with selected partners who help us to provide you with the information, products and services that you request from us. For example, the AA who provide roadside assistance on our behalf.

The contents of this statement may change from time to time so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of any substantial changes.

This version of our **Privacy Statement** is live from 21 April 2018.

What information do we collect?

We collect information about you and your vehicle when you engage with our website, applications or Manufacturer. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

We collect information about you or your vehicle when you buy or sell a vehicle, make an enquiry or use our products and services.

The information we collect includes some or all of the following:

1. Name (including title);
2. Address;
3. Phone number;
4. Date of birth;
5. Email address;
6. Vehicle information (including registration number, VIN, service reminders, mileage and warranty repair information);
7. The date and time you used our services;
8. The pages you visited on our website and how long you visited us for;
9. Your IP address;
10. Your GPS location (where you have permitted access to this);
11. The internet browser and devices you are using;
12. Cookie, Pixels or Beacon information (for more information please see our [Cookie Policy](#));
13. The website address from which you accessed our website;
14. Details of any transactions between you and us or any Retailer;
15. Where you engage with us in a business context, , we may collect your job title, company contact details (including email addresses), fleet size and company details (some of which we may obtain from an online or public business directories);
16. Voice recordings of calls you make to our dealerships;
17. "Live chat" records; and

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18. Any information within correspondence you send to us.
19. Where you act on behalf of a business, any information we collect as part of business telemarketing activity

How do we use this information?

Fish Brothers will only process information 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 communications, or share your personal information with anyone else who might.

There are various ways in which we may use or process your personal information. We list these below:

Consent:

Where you have provided your consent, we may use and process your information to:

1. Contact you from time to time about promotions, events, products, services or information which we think may be of interest to you (don't worry, we won't bombard you);
- You can withdraw your consent at any time by contacting us at marketing@fish-bros.co.uk or, in relation to any marketing messages you receive, by using the unsubscribe option included in those messages.

Contractual performance

We may use and process your personal information where this is necessary to perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us .

Legitimate Interests

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support customers with sales and other enquiries

1. To respond to correspondence you send to us and fulfil the requests you make to us (for example: test drives, service requests, brochure requests or information about specific vehicles);
2. To provide vehicle support and services (for example warranty services);
3. To provide service, maintenance and warranty information and reminders, unless you object;
4. If documents are handed over with a part exchange or a vehicle brought into stock from elsewhere we will keep these documents with the vehicle to help evidence the history of the vehicle. This is a legitimate interest not only for us and any new owner but for the wider market in regard to fraud prevention and safety.

Processing necessary for us to respond to understanding customers' and drivers' needs

4. To analyse, evaluate and improve our products and services so that your visit and use of our website, applications, customer service centre and Retailer network are more useful and enjoyable (we will generally use data amalgamated from many people so that it doesn't identify you personally);
5. To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services that we think you will be interested in. We will only send marketing communications to you if you have provided your consent for us to do so or which we have obtained in the ways mentioned in the paragraphs below;
6. For product development purposes (for example to improve vehicle quality, performance and safety);

Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns

8. To send you marketing information from time to time after you have purchased a product or service from us or made a purchasing enquiry, closed your browser with items in your shopping basket or requested a test drive, brochure or other information of interest. We will only contact you with information about our own products and services (and in ways the law allows), which we hope you will like. You have the right to object to us sending you this information at any time;
9. To contact you from time to time with marketing information (unless you object) if you have expressly indicated to us that you are acting on behalf of a business or where we have obtained your business contact details from our Retailer Network or an online or public business directory. In relation to any such information we send by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing;
10. To contact you with targeted advertising delivered online through social media and other platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us;
11. To identify and record when you have received, opened or engaged with our website or electronic communications (please see our [Cookie Policy](#) for more information);
12. To administer competitions and promotions that you enter with us from time to time and to distribute prizes;
13. To contact you on seasonal opening hours, closes or moving premises.

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

15. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer;
16. For network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;
17. 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 lists in order to be able to comply with your request);
18. To inform you of updates to our terms and conditions and policies.

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Legal Obligation

We may process your personal information to comply with our legal requirements (for example to register your car with the DVLA).

Vital Interest

Sometimes we will need to process your personal information to contact you if there is an urgent safety or product recall notice and we need to tell you about it.

How do we share this information?

We do not sell your information to third parties, but we do work closely with our Manufacturers and with third party suppliers who fulfil business activities for us (like roadside assistance, marketing, events and market research etc.)

We do not sell your information to third parties. However, we may from time to time disclose your information to the following categories of companies or organisations to which we pass the responsibility to handle services on our behalf: roadside assistance service providers, customer contact centres, mobility and car hire providers, direct marketing communications agencies and consultants, market research and market analytics service providers, our legal and other professional advisors.

We will also share your information with our Manufacturers in situations where we need to pass your information to them in order to manage any request or complaint you have made to us.

We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated non specific data sets where ever possible.

There are circumstances where we share your information with other dealerships within our Group in order to fulfil orders, transactions, handle complaints or provide you with a service or information that you have requested. For example we will share information with our Financial Services provider where you enquire about their services through us or where you make a complaint to us and later make the same or similar complaint to them.

How long do we keep your information for?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a customer or otherwise have a relationship with us we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

We do not retain personal information in an identifiable format for longer than is necessary.

If we have a relationship with you (e.g. you are a customer or the registered driver of a leased or other vehicle purchased from us), we hold your personal information for 6 years from the date our relationship ends. We hold your personal information for this period to establish, bring or defend legal claims. Our relationship may end for a number of reasons including where the vehicle warranty or lease expires, or we have been made aware that you no longer own or drive that vehicle.

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Where we have obtained your personal information following a request for information, test drive, brochure, quotation or any other information on any of our products or services, we hold your personal information for 1 year and 6 months from the date we collect that information, unless during that period we form a relationship with you e.g. you purchase or lease a vehicle. We hold your personal information for this period to give us an opportunity to form a relationship with you.

The only exceptions to the periods mentioned above are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- Where you have raised a legal claim, complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [How can I manage the information we hold about you](#));

How can I manage the information we hold about you

You have the right as an individual to access your personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for 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 any request (including any identification documents requested).

You have the right to:

1. Ask for a copy of the information that we hold about you;
2. Correct and update your information;
3. Withdraw your consent (where we rely on it). Please see further [How do we use this information](#);
4. Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
5. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information;
6. Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

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You can exercise the above rights and/or manage your information by contacting us using the details below:

Marketing@fish-bros.co.uk

Fish Brothers (Swindon) Ltd

Kia and VW Dealership
Ashworth Road
Bridgemoor
Swindon
Wiltshire SN5 7UR
01793 645507

If you have any specific data protection concerns or a complaint, you can address it to our Data Protection Lead Debbie.reeve.crook@fish-bros.co.uk

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are below:

Post:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Call:

0303 123 1113

Email:

casework@ico.org.uk.