

Privacy Policy

Data controller: Keith Gott, Greenwood Farm, Old Odiham Road, Alton, Hampshire, GU34 4BW ('Keith Gott')

Keith Gott collects and processes personal data relating to its customers to manage the relationship. Keith Gott is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does Keith Gott collect?

We collect two types of data and information.

The first type of information is unidentified and non-identifiable information pertaining to a user(s), which may be made available or gathered via your use of our website ("Non-personal Information"). We are not aware of the identity of a user from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our website. We may also collect information on your activity on our website (e.g. pages viewed, online browsing, clicks, actions, etc.).

The second type of information (Personal Information), which is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual. Such information includes:

- **Device Information:** We collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through our website.

Keith Gott collects and processes a range of information about you. This includes:-

- your name, address and contact details, including email address, telephone number and fax number
- details of your bank account
- information about any driving accidents, claims or convictions
- referee name and address
- driving licence
- vehicle V5
- photo ID
- credit card/debit card information
- your insurers or warranty company name and contact details

Keith Gott may collect this information in a variety of ways. For example, data might be collected through application forms or other identity documents such as your driving licence; from forms you voluntarily complete either in paper format or via forms found on our website; from correspondence with you; from third party providers, services and public registers (for example, traffic analytics vendors); or through interviews, meetings or other assessments.

In some cases, Keith Gott may collect data about you from third parties, such as references supplied.

Data will be stored in a range of different places, including Keith Gott's accounts management systems and in other IT systems (including Keith Gott's email system).

When you use our website, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy.

Why does Keith Gott process personal data?

Keith Gott needs to process data to ensure effective business administration and legislation. For example, it needs to process your data to provide you with any product recalls. Personal information will only be used by Keith Gott to enable us to carry out the work requested and to raise any invoices for services provided. Direct marketing activities will be limited to reminders regarding vehicle servicing or MOT.

In some cases, Keith Gott needs to process data to ensure that it is complying with its legal obligations. For example, to charge the correct VAT and to comply with contracts.

In other cases, Keith Gott has a legitimate interest in processing personal data before, during and after the end of our relationship. Processing your data allows Keith Gott to:-

- process online bookings
- send statements and invoices by post/email
- carry out trade references to assist with decision making on your ability to pay when you apply for an account
- deliver purchased goods
- contact you in relation to recalled or deficient goods
- provide you with insurance on our loan cars
- meet requirements when providing you with certain replacement vehicle keys
- liaising with insurance/warranty companies for repairs to vehicles
- send you reminders when your service and/or MOT is due
- card data is sometimes taken over the telephone so you can pay for goods and/or services by credit or debit card. Card data is processed in accordance with our Information Security Policy
- to collect and recover money that is owed to us
- to respond to complaints and seek to resolve them
- to obey laws and regulations that apply to us
- to run our business in an efficient and proper way
- IT support including cloud backup
- make payment to you for goods and services
- provide references on request
- respond to and defend against legal claims

Who has access to data?

Sometimes we need to share personal information we hold about you with other organisations that we work with or who provide services on our behalf. When sharing information we will comply with all aspects of data protection law.

Where sharing is in our legitimate business interests, we may share your information without seeking your consent first. This may be with:-

- our contractors or suppliers to facilitate repairs, maintenance or improvement works
- debt and money management advisors
- police and other relevant authorities (e.g. HM Revenue and Customs) in relation to the prevention and detection of crime, the apprehension of offenders or the collection of tax or duty

We may also share information when required by law for example where ordered by the Court or to protect an individual from immediate harm.

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites.

Some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

Cookies

We and our trusted partners use cookies and other technologies in our related services, including when you visit our website or access our services.

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are very helpful and can be used for various different purposes. These purposes include allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and our services quicker and easier. Cookies are also used to help make sure that the advertisements you see are relevant to you and your interests and to compile statistical data on your use of our services.

Cookies do not contain any information that personally identifies you, but Personal Information that we store about you may be linked, by us, to the information stored in and obtained from cookies. You may remove the cookies by following the instructions of your device preferences; however, if you choose to disable cookies, some features of our website may not operate properly and your online experience may be limited.

We use a tool to collect information about your use of our website. The tool collects information such as how often users access our website, which pages they visit when they do so, etc. The tool does not collect any Personal Information and is only used by our website hosting and operating service provider to improve our website and services.

Use of script libraries

In order to present our contents correctly and make them graphically appealing across all browsers, we use script libraries and font libraries such as Google Web Fonts on our website. Google Web Fonts are transferred to your browser's cache to avoid multiple loading. If your browser does not support Google Web Fonts or does not allow access, content will be displayed in a default font.

- Calling script libraries or font libraries automatically triggers a connection to the library operator. In theory, it is possible – but currently also unclear whether and, if so, for what purposes – that operators of corresponding libraries collect data.

Third-party collection of information

Our policy only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. Accordingly, we encourage you to read the terms and conditions and privacy policy of each third party that you choose to disclose information to.

This Privacy Policy does not apply to the practices of companies that we do not own or control, nor to individuals whom we do not employ or manage, including any of the third parties which we may disclose information to as set out in this Privacy Policy.

Advertisements

We may use a third party advertising technology to serve advertisements when you access our website. This technology uses your information with regards to your use of the services to serve advertisements to you (e.g., by placing third-party cookies on your web browser).

You may opt out of many third party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA"). For more information about this

practice by NAI and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third party ad networks operated by NAI and DAA members, please visit their respective websites.

Minors

We understand the importance of protecting children's privacy, especially in an online environment. Our website is not designed for or directed at children. Under no circumstances shall we allow the use of our services by minors without prior consent or authorisation by a parent or legal guardian. We do not knowingly collect Personal Information from minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at Keith Gott, Greenwood Farm, Old Odiham Road, Alton, Hampshire, GU34 4BW.

How does Keith Gott protect data?

We take great care in implementing and maintaining the security of our website and your information. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorised access or abuse our website, and we make no warranty, express, implied or otherwise, that we will prevent such access.

Keith Gott has internal controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees in the performance of their duties.

Where Keith Gott engages third parties to process personal data on its behalf, they do so under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does Keith Gott keep data?

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable opportunity. Under applicable regulations, we will keep records containing client personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request
- require Keith Gott to change incorrect or incomplete data
- require Keith Gott to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where Keith Gott is relying on its legitimate interests as the legal ground for processing

If you would like to exercise any of these rights, please contact the Administration Office, Keith Gott, Greenwood Farm, Old Odiham Road, Alton, Hampshire, GU34 4BW.

If you believe that Keith Gott has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

Failing to provide the data may mean that you are unable to exercise your statutory rights.

Automated decision-making

Decisions are not based solely on automated decision-making.

Recording customer/visitor/employee details to support NHS Test and Trace

To support NHS Test and Trace (which is part of the Department for Health and Social Care) in England, we have been mandated by law to collect and keep a limited record of staff, customers and visitors who come onto our premises for the purpose of contact tracing.

By maintaining records of staff, customers and visitors, and sharing these with NHS Test and Trace where requested, we can help to identify people who may have been exposed to the coronavirus.

As a customer/visitor/employee of Keith Gott you may be asked to provide some basic information and contact details. The following information will be collected:

- the names of all customers or visitors, or if it is a group of people, the name of one member of the group
- a contact phone number for each customer or visitor, or for the lead member of a group of people
- date of visit and arrival time and departure time

The venue/establishment as the data controllers for the collection of your personal data, will be responsible for compliance with data protection legislation for the period of time it holds the information. When that information is requested by the NHS Test and Trace service, the service would at this point be responsible for compliance with data protection legislation for that period of time.

The NHS Test and Trace service as part of safeguarding your personal data, has in place technical, organisational and administrative security measures to protect your personal information that it receives from the venue/establishment, that it holds from loss, misuse, and unauthorised access, disclosure, alteration and destruction.

In addition, if you only interact with one member of staff during your visit, the name of the assigned staff member will be recorded alongside your information.

NHS Test and Trace have asked us to retain this information for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period. We will only share information with NHS Test and Trace if it is specifically requested by them.

For example, if another customer at the venue reported symptoms and subsequently tested positive, NHS Test and Trace can request the log of customer details for a particular time period (for example, this may be all customers who visited on a particular day or time-band, or over a 2-day period).

We may require you to pre-book appointments for visits or to complete a form on arrival.

Under government guidance, the information we collect may include information which we would not ordinarily collect from you and which we therefore collect only for the purpose of contact tracing. Information of this type will not be used for other purposes, and NHS Test and Trace will not disclose this information to any third party unless required to do so by law (for example, as a result of receiving a court order). In addition, where the information is only collected for the purpose of contact tracing, it will be destroyed by us 21 days after the date of your visit.

However, the government guidance may also cover information that we would usually collect and hold onto as part of our ordinary dealings with you (perhaps, for example, your name, date of birth and phone number). Where this is the case, this information only will continue to be held after 21 days and we will use it as we usually would, unless and until you tell us not to.

Your information will always be stored and used in compliance with the relevant data protection legislation.

The use of your information is covered by the General Data Protection Regulations Article 6 (1) (c) – a legal obligation to which we as a venue/establishment are subject to. The legal obligation to which we're subject, means that we're mandated by law, by a set of new regulations from the government, to co-operate with the NHS Test and Trace service, in order to help maintain a safe operating environment and to help fight any local outbreak of corona virus.

Some data recipients may be located outside the EEA. In such cases we will transfer your data only to such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

By law, you have a number of rights as a data subject, such as the right to be informed, the right to access information held about you and the right to rectification of any inaccurate data that we hold about you.

You have the right to request that we erase personal data about you that we hold (although this is not an absolute right).

You have the right to request that we restrict processing of personal data about you that we hold in certain circumstances.

You have the right to object to processing of personal data about you on grounds relating to your particular situation (also again this right is not absolute).

If you are unhappy or wish to complain about how your information is used, you should contact a member of staff in the first instance to resolve your issue.

If you are still not satisfied, you can complain to the Information Commissioner's Office. Their website address is www.ico.org.uk.

Changes to this Privacy Policy

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised Privacy Policy. The last revision will be reflected in the "Last modified" section. Your continued use of the Platform, following the notification of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

How to contact us

If you have any questions about our website or the information we collect about you and how we use it, you can contact us at:-

Keith Gott
Greenwood Farm
Old Odiham Road
Alton
Hampshire
GU34 4BW