The Trade Centre Group PLC (TTCG) Privacy Notice

We are The Trade Centre Group Plc, trading in Wales under the name ***The Trade Centre Wales*** and ***The Trade Centre UK*** in England.

The Trade Centre Group Plc *("we", "us", "our")* is authorised and regulated by the Financial Conduct Authority (FCA registration number 689365) and is permitted to carry out regulated consumer credit activities, including acting as a credit broker and not a lender.

Purpose of This Privacy Notice

TTCG respects your privacy and is committed to protecting your personal data. This Privacy Notice explains how we collect, use, and safeguard your information when you visit our website (regardless of your location), access our sites, or use any of our services. It also outlines your privacy rights and how the law protects you.

Our aim is to provide clear information about what personal data we gather, how and why we process it, and the circumstances under which it may be used. This includes data collected through your interactions with our website, the products and services we supply, and any information you provide when receiving marketing communications, such as product updates or special offers.

Our website, products, and services are not intended for children, and we do not knowingly collect data relating to children.

This Privacy Notice should be read in conjunction with any other privacy communications we may issue on specific occasions when collecting or processing your personal data. Reading all notices together ensures you are fully aware of how and why we process your personal data, as this document is intended to supplement existing notices.

Controller

TTCG is the controller and is responsible for your personal data (referred to as *"TTCG", "we", "us", or "our"* throughout this privacy notice).

Data Protection Officer

We have appointed a Data Protection Officer (***DPO***) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

The DPO can be contacted as follows:

Email: *dpo@ttcg.co.uk*

Postal address: *Euro Centre, Neath Abbey Business Park, Neath Abbey, SA10 7DR*

Telephone: *(01792) 814300*

You have the right, if you wish to do so, to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Updates to This Privacy Notice and Your Responsibility to Inform Us

The accuracy of your information is important to us. Please keep us informed if your personal data changes during your relationship with us. For example, if your postal address, email address, or telephone number changes, please notify our marketing department at marketing@ttcg.co.uk.

This Privacy Notice was last updated on 5 October 2026.

Third-Party Links

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified; this does not include data where the identity has been removed (*anonymous data*).

We may collect, use, store, and transfer various kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, username or similar identifier, marital status, title, date of birth, gender, address history, employment information, income, and ID data.
- **Contact Data** includes billing address, delivery address, email address, and telephone numbers.
- **Financial Data** includes income, bank details, bank account, financial information, and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, 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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you use our website, products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Vehicle Identification** which includes make, model, vehicle registration, and mileage.

We also collect, use, and share **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. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we ever combine Aggregated Data with personal data in a way that could identify you, we will treat the combined information as personal data and handle it in accordance with this Privacy Notice.

We do not routinely ask customers to provide **Special Category** personal data. However, you may choose to share information about your health, medical conditions, known vulnerabilities or other sensitive personal information when contacting us; for example, during calls, correspondence or when raising a concern with one of our staff. Where this information is included in call recordings, transcripts, case notes or other records, we will only process this information, where necessary, to handle and investigate your concerns, resolve disputes, respond to regulatory enquiries, or establish, exercise or defend legal claims involving you, TTCG or other relevant parties.

If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How Your Personal Data Is Collected

We use different methods to collect data about you including:

Direct interactions

You may provide us with your Identity, Contact, and Financial Data by completing an application form or by contacting us by post, phone, email, or any other method. This includes personal data you provide when you:

- Apply for or purchase our products or services, including vehicles.
- Apply for credit or hire purchase facilities.
- Create an account on our website.
- Request marketing communications.
- Provide feedback.

If you supply personal information about another individual as part of your enquiry or application, you confirm that you have their consent to share their details with us and for us to process their information, including for joint applications.

Automated technologies or interactions

When you use our website, we may automatically collect Technical Data about your device, browsing behaviour, and usage patterns. This is gathered through cookies, server logs, and similar technologies. We may also receive Technical Data from other websites that use our cookies.

Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources, including:

- Contact, Financial, and Transaction Data from finance companies, lending partners, and credit brokers (as detailed in paragraph 4).
- Contact, Financial, and Transaction Data from credit reference and fraud prevention agencies (as detailed in paragraph 4).
- Identity, Contact, and Financial Data from individuals who submit a

joint application with you for a vehicle purchase or for credit or hire purchase facilities.

- Identity, Contact, and Financial Data from search information providers.
- CCTV footage: If you visit any Trade Centre Group PLC sites, we may collect photographic images and video recordings of you via CCTV for security, crime prevention, and insurance purposes only.

How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

To perform a contract we are about to enter into, or have already entered into, with you.

- Where it is necessary for our legitimate interests (or those of a third party).
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent.

Purposes for Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Please note that we may process your personal data on more than one lawful basis, depending on the specific purpose for which we are using it. Details of the specific legal grounds we rely on, where more than one lawful basis applies, are set out in the table below.

Purpose / Activity	Type of Data	Lawful Basis for Processing
Assisting you with the purchase of a vehicle and preparing an application for hire purchase or a loan facility	Identity, Contact, Financial, Transaction	a) **Performance of a contract** (to take steps at your request before entering into a finance agreement) b) **Legitimate interests** (to enable you to purchase a vehicle and related products/services)
Disclosure to lending/finance partners for the purpose of providing hire purchase or loan facilities	Identity, Contact, Financial, Transaction	a) **Performance of a contract** b) **Legitimate interests** (to progress your finance application)
Obtaining a credit reference from a credit reference agency	Identity, Contact, Financial	a) **Performance of a contract** (necessary to apply for finance) b) **Legitimate interests** (to assess affordability and prevent fraud)
Identity verification checks using *Onfido Ltd*	Identity, Document Details, Photo	a) **Performance of a contract** b) **Legitimate interests** (fraud prevention and ID verification for finance applications)
Assisting with the purchase of a Lifetime Warranty *(EMaC Limited)*	Identity, Contact, Financial, Transaction	a) **Performance of a contract** b) **Legitimate interests** (to offer and administer warranty products)
Payment subscription support (Payment Assist Limited)	Identity, Contact, Financial, Transaction	a) **Performance of a contract** b) **Legitimate interests** (to manage and maintain your subscription)
To receive a free of charge 30-day GAP insurance Policy which is	Identity, Contact, Vehicle Details	a) **Performance of a contract** b) **Legitimate interests** (to

extendable (Warranty Professionals Limited)		manage and maintain your subscription)
We will take card payments using one UK payment provider that helps us (TTCG) to accept card payments on one platform *(Atoa Payments Ltd)*	Identity, Contact, Vehicle Details	**Performance of a contract**
Introduction to *Tracker Network (UK) Limited* for *Premium Protection Pack*	Identity, Contact, Vehicle Details	a) **Performance of a contract** b) **Legitimate interests** (to supply products/services requested by you)
Use of *Chirple Limited (trading as Direct Affinity Europe)*, who provide and manage our online finance application infrastructure and deliver outsourced customer contact centre services on our behalf	Identity, Contact, Financial, Technical, Usage	a) **Performance of a contract** (to process and manage your finance application) b) **Legitimate interests** (to ensure efficient handling of enquiries and to support customer service operations)
Processing an online part-exchange valuation request	Identity, Contact, Financial	**Performance of a contract**
Processing a discount voucher request	Identity, Contact	**Performance of a contract**
Processing an online finance application	Identity, Contact, Financial, Transaction	a) Performance of a contract b) Legitimate interests (to progress your application)
Registering you as a new customer	Identity, Contact	Performance of a contract
Processing *V5C* documentation (registered keeper details)	Identity, Contact	a) Legal obligation (DVLA requirements) b) Legitimate interests (vehicle ownership verification)
Processing and delivering your order; managing payments, fees, charges; debt recovery	Identity, Contact, Financial, Transaction,	a) Performance of a contract

	Marketing & Communications	b) Legitimate interests (to recover debts due)
Conducting Anti-Money Laundering (AML), fraud and crime-prevention checks	Identity, Contact, Financial, Transaction	Legal obligation
Managing our relationship with you (e.g., policy updates, surveys, review requests)	Identity, Contact, Profile, Marketing & Communications	a) **Performance of a contract** b) **Legal obligation** c) **Legitimate interests** (keeping records updated, understanding service use)
Administering and protecting our business and website *(IT, security, testing, support, hosting)*	Identity, Contact, Technical	a) **Legitimate interests** (running our business, IT security) b) **Legal obligation**
Delivering relevant website content and advertising; measuring effectiveness	Identity, Contact, Profile, Usage, Technical, Marketing & Communications	a) **Consent** (for personalised advertising and tracking cookies) b) **Legitimate interests** (for non-personalised advertising)
Digital Advertising *(e.g., Google Ads, Google Maps)*	IP Address, Technical Data, Usage Data, and any personal data you share with advertisers	a) **Consent** (for personalised or targeted advertising) b) **Legitimate interests** (for basic analytics and non-personalised ads)
Using data analytics to improve website, products, marketing and customer experience	Technical, Usage	**Legitimate interests** (to understand service usage and improve performance)
Making suggestions and recommendations for goods or services	Identity, Contact, Technical, Usage, Profile, Marketing & Communications	a) **Consent** (for electronic marketing) b) **Legitimate interests** (to grow our business)
Disclosure to third-party companies regarding fines or charges relating to hire vehicles	Identity, Contact	**Legitimate interests** (to allow third parties to recover fines incurred during hire)

Disclosure to third parties issuing fines, penalties or legal proceedings relating to vehicles purchased	Identity, Contact	**Legal obligation** (to identify the owner/keeper involved in an offence)
CCTV monitoring at Trade Centre Group PLC sites for security, crime prevention, and insurance purposes	Photographic Images, Video Recordings	a) **Legitimate interests** (to ensure site security, prevent crime, and support insurance investigations) b) **Legal obligation** (where required for law enforcement or regulatory purposes)

Credit Eligibility Checks (Soft Searches)

When you complete a free finance check or submit an online application with TTCG to assess your potential eligibility for credit or hire purchase facilities, DealTrak Limited acts as a processing agent on behalf of TTCG and our panel of lenders. DealTrak analyses your information to determine your likely financial status. This is known as a **"***soft search***."**

Soft searches may be carried out by one or more Credit Reference Agencies (*CRAs*), including Experian, Equifax, and TransUnion. A soft search reviews publicly available information such as the Electoral Register, County Court Judgments (CCJs), bankruptcy records, or repossessions, together with the information you provide in your application. It helps identify suitable credit products and may generate an automated eligibility decision.

Soft searches:

- Do not affect your credit score.
- Are visible only to you on your credit file.
- Do not appear to lenders as part of a formal credit application.

Credit Applications (Hard Searches)

If you decide to proceed with a full application for credit or hire purchase facilities, TTCG will process your personal data, and submit your application to our select panel of lenders. These partners may carry out a "hard search" (also called a credit application search) with a CRA to assess your financial history and creditworthiness.

Hard searches:

- Are visible to other lenders.
- Leave a search footprint on your credit file.
- May impact your credit score, depending on circumstances.
- If you are making a joint application, your data will be linked with that of your joint applicant, or other financial associates.

Use of Credit Reference Agencies and Fraud Prevention Measures

Credit Reference Agencies also act as fraud prevention agencies. They may share information with other organisations for purposes such as:

- Assessing future credit applications
- Tracing debtors and recovering debts
- Preventing fraud and financial crime

Lenders will continue to update CRAs about your credit accounts on an ongoing basis, including information about settled accounts and any missed or late payments. CRAs may then share this information with other organisations.

You can request full details of the CRAs, and fraud prevention agencies used by TTCG and our lenders by contacting our Data Protection Officer either via email, or post.

Email: *dpo@ttcg.co.uk*

Postal address: *Euro Centre, Neath Abbey Business Park, Neath Abbey, SA10 7DR*

Credit Reference Agencies We Work With

Our finance companies use the following credit reference agencies:

- **Equifax Europe UK Limited**
  PO Box 3001, Glasgow, G2 9HQ
  Website: www.equifax.co.uk
- **Experian Plc**
  PO Box 8000, Nottingham, NG1 5GX
  Website: www.experian.co.uk
- **TransUnion Information Group Limited**
  1 Park Lane, Leeds, LS3 1EP
  Website: www.transunion.co.uk/legal/privacy-centre/pc-credit-reference

The Credit Reference Agencies provide further details on how they use and share your data through the Credit Reference Agency Information Notice (CRAIN), available at:

- www.equifax.co.uk/crain/
- www.experian.co.uk/legal/crain/
- www.transunion.co.uk/legal/privacy-centre/pc-credit-reference

Automated Decisions and Credit Profiling

We may pass your personal data to our third-party lenders, who use automated decision-making tools, such as credit scoring systems operated by CRAs to assess your creditworthiness and determine your eligibility for finance products.

You have the right not to be subject to a decision based solely on automated processing, if this will have a legal or other significant effect on you.

Our third-party lenders will use automated decision-making in the following ways:

Credit scoring and affordability assessment

Information collected from your application, our internal systems, CRAs, and other third-party sources may be analysed automatically to assess your creditworthiness, affordability, and potential eligibility for credit or hire purchase facilities.

If you disagree with an automated outcome, you have the right to ***appeal the decision*** and request a manual review. The lender may ask you to provide additional information before a human reviewer reassesses your application.

Fraud and Money Laundering risk checks

Automated systems may identify patterns consistent with known fraudulent activity, money laundering risks, or inconsistencies with information you previously provided. If detected, a lender may determine that you present a fraud or money-laundering risk.

Profiling for product suitability

Lenders may conduct profiling to assess the suitability of any new or existing credit products based on your financial information and credit history.

Marketing & Consent

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. For these purposes, we strive to provide you with choices regarding certain personal data uses, particularly around marketing. For the purposes of marketing, we may share your information with certain third parties, market research and analytics service providers, where you have provided consent. Your personal data will be used for personalised and non-personalised advertising; the data collected will be your

name, IP address and other personal data you may choose to provide to use third party products and services.

Marketing Preferences

We strive to provide you with clear choices regarding the use of your personal data for marketing purposes. Where you have provided consent, we may share your information with selected third parties, including (but not limited to) Meta, Google, Microsoft, and market research or analytics service providers.

Your personal data may also be used for both personalised and non-personalised advertising. We only process and share this data where you have explicitly opted in, and you can withdraw your consent at any time.

Consent Management

We use the CookieYes platform to manage user consent for cookies and tracking technologies. When you visit our site, you can choose which types of data we collect and process. Your preferences are respected across all our systems.

If you do not see a CookieYes consent pop-up, we will assume you have not opted into cookie collection.

Marketing Consent

At the end of our application and part-exchange forms, you may choose to opt-in to receive marketing communications. This includes emails, SMS, and offers from us.

Consent wording

“Yes, I’d like to receive exclusive offers via (You can opt out of these anytime):”. If you do not opt-in, your data will not be used for marketing emails or SMS.

Purchasing a Vehicle

If you purchase a vehicle from us, we may send you email communications about similar products and services under the soft opt-in rules.

You will receive a follow-up email after purchase that includes:

- A link to leave a review.
- A clear and simple link to opt out of future marketing communications.

This approach complies with UK regulations, allowing us to maintain contact with existing customers while respecting your right to opt out at any time.

Data Sharing

If you provide explicit consent, we may share your data in the following ways:

Use of HubSpot

We may process your information using HubSpot for customer relationship management and communication purposes.

Use of tracking data

Tracking information (such as UTM parameters) may be used to personalise your experience and better understand how you interact with our services.

Sharing with trusted third-party platforms

Your data may be shared with selected partners such as **Meta**, **Google**, and **Microsoft** for service improvement, conversion tracking, and performance analysis.

Consent wording

If you choose to provide consent, you will be asked to agree to the following statement:

"I consent to my data being shared with third-party platforms (e.g., Google) for service improvement, conversion, and performance analysis."

If you do not provide explicit consent

If you do not give explicit consent, we will limit the use and sharing of your personal data as follows:

- Essential processing only - Your data will be used solely for operational purposes, such as processing your application through DealTrak or conducting credit searches via Experian.
- No marketing data shared or stored - Your data will not be used for marketing, analytics, or shared with third-party marketing platforms.

Call Centre Operations

Our Call Centre may contact you under **legitimate interest** or **contractual necessity**; for example, to progress your enquiry, confirm details, or provide updates relating to your application or purchase:

- Your data will remain in the call queue for a **maximum of 3 months**, after which it will be automatically deleted where it is compliant to do so.
- Our Call Centre will **not use your data for marketing** beyond the services you have specifically requested.

Promotional Offers from Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Opting out

You can opt out of receiving marketing communications (email or SMS) at any time by using the **'unsubscribe'** link included in every marketing message.

You may also ask us or any relevant third parties to stop sending you marketing communications by:

- Following the opt-out links at the bottom of any marketing email we send
- Emailing *marketing@ttcg.co.uk*
- Writing to us at:

  The Trade Centre Group Plc, Euro Centre, Neath Abbey Business Park, Neath Abbey, SA10 7DR

Opting out of marketing communications does ***not*** affect personal data provided to us as part of a product or service purchase, warranty registration, service experience, or any other transactional activity.

Please note that opting out of operational calls such as those relating to finance applications ***does not remove your marketing preferences***. If you wish to stop receiving marketing messages, you must unsubscribe separately.

Cookies

For more information on Cookies, please refer to our Cookie Policy. This explains what cookies are and how we use them.

Change of Purpose

We will only use your personal data for the purposes for which it was collected, unless we reasonably determine that we need to use it for another purpose and that the new purpose is compatible with the original one. If you would like an explanation of how any additional processing is compatible with the original purpose, please contact us.

If we need to use your personal data for a purpose that is unrelated to the reason it was originally collected, we will notify you and explain the legal basis that permits this.

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

Disclosures of Your Personal Data

We may need to share your personal data with third parties for the purposes described in paragraph 4 of this Privacy Notice. These third parties may include:

- **Can Can Car Finance Limited,** who are a 100% owned subsidiary of The Trade Centre Group Plc.
- **Third-party marketing providers** who support us in delivering services you have requested, including email and SMS marketing, TV and radio advertising, direct mail, telephone marketing, and digital advertising.
- **Our lending and finance partners** who assess credit applications.
- **Onfido Limited** provides our identity verification services.
- **TCi Futures Limited** who are the administrators of Freesure and Free Fuel for a Year on behalf of The Trade Centre Group Plc.
- **EMaC Limited** who are the administrators of warranties.
- **Payment Assist Limited** who are the administrators of subscription payments.
- **Atoa Payments Limited** helps us take card payments using one UK payment provider.
- **Third-party IT providers** who support the processing of vehicle or credit applications.
- **Credit reference agencies** and fraud prevention agencies.
- **Service providers and agents** who deliver IT, system administration, or operational support services.
- **Warranty Professionals Limited** are introducers of a free of charge 30-day GAP insurance policy which is extendable.
- **Professional advisers** including lawyers, bankers, auditors, and insurers.
- **HM Revenue & Customs, regulators, and other authorities**

who may require reporting in specific circumstances.

- **Law enforcement, councils, and private parking operators;** for example, where fines, penalties, or charges relating to a vehicle purchased from us need to be pursued directly with you as the vehicle owner.
- **Third-party organisations** conducting anti-money laundering, fraud, and crime-prevention checks.
- **Chirple Limited (trading as Direct Affinity Europe),** who provide and manage our online finance application infrastructure and deliver outsourced customer contact centre services on our behalf.
- **Tracker Network (UK) Limited** who provide and administer the tracker device.
- **Third parties involved in business transactions**, such as prospective buyers or merger partners. If a change of ownership occurs, the new owners may use your data as set out in this Privacy Notice.

For further information about the third parties with whom we share your data, you may contact our Marketing Department at **marketing@ttcg.co.uk**. Please note this list is not exhaustive and may be updated periodically.

We require all third parties to protect your personal data and process it lawfully. We do not allow third-party service providers to use your personal data for their own purposes; they may only process your data for specific purposes and in accordance with our instructions.

Data Security

We have put in place appropriate security measures 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 interest and a need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

International Transfers

Some of our external third parties are located outside the UK and the European Economic Area (***EEA***). As a result, their processing of your personal data may involve transferring your information outside these regions.

Whenever we transfer your personal data outside the UK or the EEA, we ensure that a similar level of protection is applied by implementing at least one of the following safeguards:

- **Adequacy decisions:** We will only transfer your personal data to countries that the relevant regulatory authority has determined provide an adequate level of data protection.
- **Approved contractual safeguards:** Where we use certain service providers, we may rely on contracts containing standard data protection clauses approved by the appropriate regulatory authority, which provide your personal data

with the same level of protection as within the UK.

If you would like further information about the specific safeguards we use when transferring your personal data outside the UK or the EEA, please contact us.

Data Retention

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including meeting legal, accounting, and regulatory requirements.

When determining how long to keep personal data, we consider:

- The amount, nature, and sensitivity of the data.
- The potential risk of harm from unauthorised use or disclosure.
- The purposes for which we process the data and whether these can be achieved in another way.
- Applicable legal obligations.

Vehicle Purchases

If you purchase a vehicle from us, we will retain records of the sale and all related personal data for **6 years and one month** from the date you acquired the vehicle, or from the date our relationship ends (for example, the expiry of your agreement with us or your finance company). We retain this information to meet legal and internal policy requirements and, where necessary, to establish, exercise, or defend legal claims.

If No Purchase Is Made

If you do not proceed with a purchase, we retain your personal data for **12 months** to allow us to make suggestions or recommendations about goods or services that may be of interest to you.

If Your Data Has Been Sent to a Lender

If your personal data has been shared with a lender as part of an application or enquiry, that lender may retain your data for **up to 6 years** in accordance with their regulatory and legal obligations.

Call Recordings

Calls *may* be recorded for training and monitoring purposes. These recordings are retained for **30 days**.

Part-Exchange, Discount Voucher, or Finance Applications (No Purchase Made)

If you submit a part-exchange valuation request, a discount voucher request, or an online finance application but do not proceed with a purchase, your data will be automatically deleted after **12 months of inactivity**, unless you have agreed to a longer retention period.

Retention Period Exceptions

We may retain your personal data for longer or shorter periods if:

- We are legally required to do so; or,
- There is an ongoing dispute, investigation, or complaint.

Where retention is extended, it will only continue for as long as necessary to resolve the matter.

Anonymised Data

In some cases, we may anonymise your personal data so that it can no longer be linked to you. We may use this anonymised information indefinitely for research or statistical purposes without further notice.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include:

- **Right to access**

  You can request a copy of the personal data we hold about you (a "data subject access request") and check that we are processing it lawfully.

- **Right to correction**

  You can ask us to correct any incomplete or inaccurate personal data we hold about you. We may need to verify the accuracy of the information you provide.

- **Right to erasure**

  You can ask us to delete your personal data where there is no valid reason for us to continue processing it. This also applies where:

  - you have successfully exercised your right to object;
  - we have processed your data unlawfully; or
  - we are required to erase it to comply with legal obligations.

  We may not always be able to comply with your request for specific legal reasons, which will be explained at the time of your request.

- **Object to processing**

  You may object to the processing of your personal data where we rely on legitimate interests (or those of a third party) and your specific situation gives you grounds to object due to the impact on your rights and freedoms.

  You also have the absolute right to object to your personal data being used for direct marketing.

  In certain cases, we may demonstrate compelling legitimate grounds that override your objection.

- **Request restriction of processing**

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

  - You want us to verify the accuracy of the data.
  - Our use of the data is unlawful, but you do not want it erased.
  - We no longer require the data, but you need us to retain it to establish, exercise, or defend legal claims.
  - You have objected to our processing, and we are considering whether our legitimate grounds override your rights.

- **Request data portability**

  You can request that we transfer your personal data to you or to a third party in a structured, commonly used, machine-readable format. This right applies only to automated data processing that you initially consented to or that is required to perform a contract with you.

- **Withdraw consent**

  Where we rely on your consent to process your personal data, you may withdraw it at any time. This will not affect the lawfulness of processing carried out before consent was withdrawn.

  If withdrawing consent affects the products or services we can provide, we will inform you at the time.

- **Rights regarding automated decision-making**

  You have the right not to be subject to a decision based solely on automated processing, including profiling, where the decision has legal or similarly significant effects on you.

  You may request human intervention, express your point of view, and challenge a decision.

  If you wish to exercise any of the rights set out above, please contact our ***Data Protection Officer***.

Exercising Your Data Protection Rights

What we may need from you

We may ask you to provide specific information to confirm your identity and to verify your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to anyone who is not entitled to receive it. We may also contact you for additional information to help us process your request more quickly.

Time limit to respond

We aim to respond to all legitimate requests within ***one month***. If your request is particularly complex or if you have made multiple requests, we may require more time. In such cases, we will notify you and keep you updated on the progress.

No fee is usually required

You will not have to pay a fee to access your personal data or to exercise any of your rights. *However*, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. In such cases, we may also refuse to comply with your request.