

CARZAM PRIVACY POLICY

ABOUT THIS POLICY

We are committed to protecting the personal information collected and processed by us. This Carzam Privacy Policy applies when you visit the Carzam website, order our products, request our services or interact with our social media sites or customer support call centre or provide feedback based on your experience through survey or research. The policy describes the information we collect, why, how and when we collect it, how we store it, how we process it and your rights under data protection legislation.

It's important that personal data is kept up to date and you should inform us if you need to make any amendments to the data we store using the contact information in this policy.

WHO WE ARE

The controller of your personal data is Carzam, located at CARZAM LTD, Samson House, Celta Road, Morley Way, Peterborough, PE2 7BW (referred to below as "we" "us" "our" or "Carzam").

THE TYPES OF PERSONAL INFORMATION WE COLLECT

We currently collect and process the following information:

- **Personal** identifiers, contacts and characteristics (for example, name, address and contact details, driving license, date of birth, utility bills)
- **Vehicle** identifiers and characteristics (for example the registration and history of a part exchange vehicle you wish for us to purchase from you)
- **Transaction** information (for example payment details to and from you)
- **Financial** information (for example bank account details, salary, employment details and financial commitments)
- **Images** (for example audio or video recordings when you phone our call centre, visit our place of business or when you accept a delivery of a vehicle at your residential address)
- **Social media** information (for example details of profiles, comments or posts from your public social media profile)
- **Cookies** we use web log cookies on our website to track user journeys for statistical purposes, personalisation and continuous user journey improvement

WHERE DO WE RECEIVE YOUR DATA FROM?

We receive information that you provide us with:

- When you visit our website or interact with our live chat function and enter personal data
- When you interact with us through social media platforms
- When you telephone or email our customer support centre as part of an enquiry
- When you buy goods and services from us and provide payment
- When you offer a part exchange vehicle for consideration as part of a transaction
- When you apply for finance
- When we telephone you to assist you with a transaction
- When we telephone you to make arrangements for a delivery or collection
- When you contact us to make a request for support in relation to a transaction, a vehicle or to make a complaint or request
- When you respond to an advertisement or promotional marketing communication

We share data with finance providers:

- When we request a finance settlement figure for a vehicle which you are selling or returning to us under your consumer rights
- When you make a finance application as part of a vehicle purchase
- To facilitate a vehicle purchase

We share data with third parties:

- When you visit our website via an vehicle sale aggregator website such as Autotrader or car Gurus and you purchase a vehicle. This information is used by them for statistical purposes
- When you purchase a vehicle we confirm your identity with a digital identity verification process through a partner agency.
- As part of the process of administering warranty claims
- When registering additional products and services associated with your vehicle that you may have purchased, where the service is provided by the supplier, for example registering the application of a paint protection product and the commencement of a guarantee.
- When we act on your request, to perform your contract with us or to carry out your order, to Carzam or to third party suppliers (including third parties such as car finance, warranty and Insurance providers) payment- or delivery-providers.
- In the event of a transaction for financing our business, a merger or an acquisition of Carzam or of (part of) its assets by a third party;
- In the event of legal claims, legal proceedings or as part of legal, risk, privacy and data protection or financial audits;
- To perform credit checks or counterparty due diligence within the above mentioned purposes;
- To parties who act as a processor on our behalf, for instance our IT or cloud service providers.
- To invite you to review any services you received from us on a dedicated customer feedback/review website in order to collect your feedback and improve our services.

We share Information with public bodies:

- When assisting the police or public authorities with enquiries or investigations
- If there is a legal obligation for us to do so, for instance to provide information to tax authorities, other government institutions or third parties as provided by law;

HOW DO WE PROCESS THIS INFORMATION

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Your **consent**. You are able to remove your consent at any time. You can do this by contacting privacy@carzam.co.uk
- We have a **contractual obligation**
- We have a **legal or regulatory obligation**
- We have a **legitimate interest**

PROVISION OF PERSONAL DATA

Where there is a statutory and contractual requirement for you to provide your personal data, any refusal or failure by you to do so may result in us being unable to enter into a contract with you and/or continue the contractual relationship with you.

HOW WE PROCESS DATA

We have set out, in the table below, a description of how we use your personal data and the legal basis we rely on to do so. For a description of the types of data see section ***The types of personal information we collect***

How we process your data	The type of data	On what Legal basis
When you use our website we will collect your postcode to ensure that you are provided with the correct delivery or collection options when considering purchasing a vehicle from us	Personal	Legitimate interest

When you complete all the mandatory processes to purchase a vehicle and make payment (not using finance)	Personal, Vehicle, Transaction	Contractual / Legitimate
When you respond to an advertisement on an Vehicle sales aggregator and make a purchase from Carzam	Personal, Vehicle	Legitimate
Sending you an invitation to complete an online review / survey	Personal	Legitimate
To respond to your enquiries about our products and services or to provide you with telephone assistance to complete a purchase or make arrangements for delivery or collection of a vehicle	Personal, Images, Social Media	Contractual / Legitimate
When we request and check your personal documentation (photo id, utility bills) for the purposes of confirming your identity to facilitate a vehicle purchase or financial transaction in a digital identification purpose with a third party (Onfido.com) or by our employee on delivery or collection of the vehicle	Personal	Regulatory
When you propose a finance application via our finance partner	Personal, Financial, Vehicle	Regulatory / Legitimate
The registration or provision of any product or service related to your vehicle purchase such as an extended warranty (Warranties 2000) or paint protection (GardX)	Personal, Vehicle	Contractual / Legitimate
To respond to and handle aftersales enquiries or assist in the provision of your statutory consumer rights such as when you make a complaint	Personal, Vehicle, Transaction Financial, Images, Social media	Regulatory / Legitimate
Registering a purchased vehicle or “passing to trade” a part exchange vehicle via the DVLA electronic services on your behalf	Personal, Vehicle	Regulatory / Legitimate / Contractual
When you offer in part exchange a vehicle for sale to us we will check its provenance by sharing data with CAP/HPI	Vehicle	Contractual / Legitimate
When you offer in part exchange a vehicle for sale to us we will share details of the vehicle for the purposes of valuation with a third party – eVA Valuations	Vehicle	Contractual / Legitimate

<p>If we arrange a courtesy vehicle subject to availability. If we agree to provide a courtesy vehicle to you for the duration of the works on your vehicle you will be asked to provide a copy of your driving licence so that we can insure the vehicle. If you incur any speeding, parking or other motoring offences when using the vehicle you will be liable for all costs and we will forward your contact data to the third party enforcing the penalties.</p>	<p>Personal, Vehicle</p>	<p>Contractual / Regulatory</p>
<p>If your vehicle breaks down and we provide your details to a breakdown assistance or recovery company for the purposes of facilitating a repair to your vehicle</p>	<p>Personal, Vehicle</p>	<p>Contractual / Legitimate</p>
<p>Contacting you with targeted promotional marketing communications through digital, non-digital and social media channels which you have chosen to be contacted through with consent gained from your personal profile on our website</p>	<p>Personal, Vehicle</p>	<p>Consent / Legitimate</p>
<p>We may take still / video images of your personal documents (photo id) during a visit by you to our place of business or when delivering or collecting a vehicle at your residential address. These videos are used for the purposes of providing security for you and our employees as well as used for training purposes and complaint handling.</p>	<p>Images</p>	<p>Legitimate interest</p>
<p>When you pay for a transaction we will use payment information provided by you to contact your bank for purposes of facilitating the transaction</p>	<p>Personal, Transaction</p>	<p>Contractual</p>
<p>When you use our website we use traffic log cookies to identify which pages are being used by you. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.</p> <p>You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website as some features may not function as a result.</p>	<p>Cookies</p>	<p>Legitimate interest</p>

STORAGE PERIOD

Personal data will not be kept by us any longer than necessary for the purposes for which they were originally collected or processed further for secondary purposes. All personal data will be stored no longer than required by the EEA privacy legislation and national laws and regulations, such as financial and tax obligations and prevention of money laundering, sanctions and financing of terrorism laws. In case you order goods from us, we keep your data as long as reasonably necessary in order to comply with our warranty obligations under the applicable period. In case you have opted in to receive newsletters from us, your personal profile is based on up to 5 years of history preceding the newsletter. The storage period of cookies can be found here. Personal data may also be kept to evidence compliance with contractual and other obligations, until the limitation period of the respective rights has expired as well as for the period required for the establishment, exercise or defence of legal claims.

YOUR PERSONAL DATA RIGHTS

Where we have gained consent to send you personalised marketing communications by channel, you can unsubscribe by channel by using any links at the bottom of each communication or by contacting the customer support team via phone on 0203 983 3455 or by e-mail to removeme@carzam.co.uk, providing specific details of the consent that you are withdrawing.

You have the right to request to access your data and to request to rectify or erase it or to restrict its processing. You also have the right to request a machine-readable subset of your data and store it elsewhere. Where the processing of your personal data is based on your consent, you are at all times entitled to withdraw this consent which will not affect the lawfulness of the processing before your consent was withdrawn.

Furthermore, you may always object against to the use of your data for direct marketing purposes, including the creation of profiles for newsletter customization and advertising. You may also object against any other processing for legitimate interest purposes in connection with your personal circumstances.

You can find more information on what your rights involves and applicable restrictions at https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

In addition, you can also give instructions on the data after your death by appointing a person who can exercise the previous rights regarding certain categories of your personal data (including special categories of data, private life, communications data an image) after your death (in the absence of such designation, these rights could be exercised by your heirs) and determine that you do not want the previous rights to be exercised after your death.

CONTACT

Requests to exercise the above rights may be submitted by sending an email to privacy@Carzam.co.uk The Privacy officer for Carzam may be contacted through privacy@Carzam.co.uk If you submit a request in relation to your data, please specify the nature of your request and the specific processing your request is about. We also may ask for further information in order to establish your identity.

We will endeavour to provide a response to your request within 1 calendar month but this may take longer dependent on the complexity of your request. In this circumstance we will contact you to keep you updated.

You may also at all times file a complaint with the data protection authority in the United Kingdom, which is the Information Commissioner's Office and more details can be found at www.ico.org.uk. If your Supervisory Authority is from an EU country, you can also find contact details for data protection authorities in EU countries at https://edpb.europa.eu/about-edpb/board/members_en.

CHANGES OF THIS POLICY

Carzam reserves the right to change this policy. Make sure you are always familiar with the latest version of this policy posted here. Please, look at the "LAST REVISED" legend at the top of this page to see when this Privacy Policy was last revised. Changes in this Privacy Policy will become effective when we make the revised Privacy Policy available on or through the Website and we will inform you of important changes in advance.