

DATA PRIVACY POLICY



1. Introduction

This Data Privacy Policy explains how Aprite (GB) Ltd (trading as West Way Nissan) uses your personal information. The document outlines what information is gathered, how it is processed, with whom it might be shared as well as how it is managed and kept secure. It also provides important information under the General Data Protection Regulation 2018 on your rights.

2. What information we collect from you

West Way Nissan collects, stores and uses personal information obtained via the following methods in order to act on an enquiry to do business, provide goods or services both now and in the future.

- Information you provide to us when sending an enquiry through our website or that of a 3rd party website to us;
- Information you provide to us during the initial enquiry and purchase of our goods or services;
- Information relating to any purchases you make of our goods or services, including any other transactions details made via any of our website (including your address, telephone number and payment details);
- Information you provide to Nissan GB Ltd or a supplier/broker where we are required to act on the enquiry as the representing Nissan dealership.
- Information you provide to us when signing up to any distribution lists to receive correspondence from us;

3. How we may use your personal data

Personal data we receive will be used for the purpose it was provided, including;

- Meet the terms of your order;
- Enable your use of the services available on our website or any other service such as Apps etc.
- Supply to you goods and services purchased from any of our businesses or via our website;
- Send statements, invoices and payment reminders to you and collect payments from you;
- Send you our marketing material on our goods and services where you have opted in
- Provide information and quotes on goods or services that may be of interest.

4. Who we may share your information with

Whilst it is not our policy to disclose information to third parties unless clearly stated at the point of provision and with documented consent, the below outlines where your data may be shared;

- We may disclose your personal information to any of our staff, agents, subcontractors or suppliers where it would be reasonable to do so to provide the products or services you require. (if consent is necessary to share your data we will ensure it is obtained prior to processing)

- Below are examples (although not limited to) of circumstances where data may be provided, should you wish for a full list of companies please ask for details.
 - Finance Houses or Brokers for the purpose of securing finance on your behalf to purchase a good or service.
 - Insurance, Warranty & Service providers for the purpose of administering or setting up such services on your behalf.
 - Motability for the purpose of processing your contract if applicable.
 - Other service providers for the purpose of providing a service or goods such as sending videos of a vehicle of interest, utilising a delivery company etc
 - Agencies that act on our behalf to fulfil marketing activity and customer follow up.
- We may be legally obliged to disclose your personal information:
 - To the extent that we are required to do so by law (such as DVLA for the purpose of registering your vehicle);
 - In connection with any ongoing or prospective legal proceedings;
 - In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
 - To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.
- Disclosure with a purchaser(s) (or prospective purchaser(s)) of any business or asset that we may either be in the process of or planning to dispose.
- Some correspondence may still occur where marketing consent has not been given due to there being a legitimate interest, this includes;
 - To inform you of a pending Service or MOT due date.
 - To update you on a current contract such as Service Plan status, Motability renewal period, Warranty contract end, Finance contract end.
 - To ensure you are happy with the service provided following a recent transaction.

5. Your Rights and how to act on them

You have the right to;

- Instruct us to provide you with any personal information we hold about you, via a Subject Access Request
 - Upon receipt of such a request we will, after confirming your identity, provide all relevant data we may hold to you in the most practical format unless otherwise stipulated or not reasonably possible.
 - We may withhold personal information that you request to the extent permitted by law.
- Have any data inaccuracies corrected as quickly as possible however it is advisable that all actions across our systems should be in place no more than 28days from request.
- Have your personal data erased, unless we are permitted to hold it by law;
- Have a restriction placed upon our processing of your data;
- Instruct us to cease all processing for marketing purposes or alter how you wish to be communicated with;
- To request your data be provided to another processor controller

If you wish to exercise any of these rights please do so as follows;

Email; marketing@westwaynissan.co.uk
Post; Marketing Dept, West Way Nissan, 41 Birmingham Road,
Wolverhampton,
West Midlands WV2 3LQ
Telephone; 01902 439 700 Option 5, Option 1

6. How we keep your data secure

- We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- We will store all personal data you provide on our secure servers or that of our suppliers which are protected via password and further security measures such as firewalls.
- We have strict agreements in place with our suppliers that your data is either deleted within defined time periods and cannot be re-used for any purpose.
- All details of financial transactions entered via our website will be protected by encryption technology.

7. Cookies

- We collect information automatically about your website visit including demographic data and browsing patterns, via the use of cookies, session file information and unique URLs.
- This information allows us to give you a better user experience without the need of entering a password every time you visit as well as enable us to conduct market research on user activity.
- We use "cookies" and unique URLs to identify you when you visit the westwaynissan.co.uk site. A cookie is a small piece of information sent by a web server to a web browser which enables the server to collect information back from the browser. A unique URL is one supplied to you that allows us to tailor our offerings to you. Both of these allow members to be presented with a personalised version of the site.
- We will only read cookies from your cookie file placed there through your web browser's interaction with the westwaynissan.co.uk site.
- We use this to log your browsing patterns and so identify the areas of the site which have been of interest to you, allowing us to personalise the westwaynissan.co.uk site for you.
- We also use information in aggregate form (in other words, no individual user is identified) to:
 - To build up marketing profiles
 - To allow us to develop the business in ways that help you
 - To manage our relationship with advertisers and
 - To audit usage of the site.
- All personal (excluding highly sensitive details), cookie and URL/session ID information are made available to West Way Nissan employees to enable us and any related third parties to deal more effectively with any enquiry you make.
- We may also capture your IP address if you consent when visiting our website through search engines such as Google, Bing, etc. in order to serve you adverts on websites you visit in the future.
- **How can you change your cookie settings?**
 - Users can control cookies via their browser settings. Please visit these 2 pages to find out more > <https://www.aboutcookies.org/> & <http://www.allaboutcookies.org/>
 - To opt-out of being tracked by Google Analytics please visit this page > <https://tools.google.com/dlpage/gaoptout>

8. ICO Registration

We are registered as a data controller with the Information commissioner's Office and our registration reference is: **Z4937145**

9. If you have any queries

West Way Nissan has a data protection officer Debbie Leicester.

Any Data protection issues can be directed to dpo@westwaynissan.co.uk.

If you wish to alter how your data is used by West Way Nissan or access your rights as outlined in section 5 then please email your requests to dpo@westwaynissan.co.uk