

## **Privacy Policy**

### **Who we are and our contact details**

TJ Vickers is the trading name of T J Vickers & Sons Ltd with company number 1636070 and whose registered office is at Trench Rd, Trench, Telford, Shropshire. TF2 6PL.

Our website is [www.tjvickers.co.uk](http://www.tjvickers.co.uk), telephone number is 01952 605301 and email address is [Info@tjvickers.co.uk](mailto:Info@tjvickers.co.uk).

### **Our work**

TJ Vickers is a Motor Dealer who sells new and used vehicles, vehicle parts and provides aftersales servicing to Main Dealer Franchise standard. We direct market our services and facilities in the best interests of our customers.

We are committed to maintain high standards of privacy and compliance with the letter and spirit of relevant data protection laws.

### **Personal data processed by T J Vickers**

The personal data that we process includes:

- data that we process on behalf of our company as a Data Processor;
- data that we process concerning our company and client prospects;
- data concerning our employees, contractors and job applicants; and
- data concerning our suppliers.

We have explained more about each of these categories below.

#### Personal data we process on behalf of our customers

We process personal data on behalf of our company for the purpose of responding to requests by our customers or prospects (e.g. for arranging a test drive) or to pro-actively provide information about our products and services that is likely to be of interest. Our phone calls may be recorded for training and monitoring purposes.

All personal data that we process on behalf of our company, we process as a Data Controller. Personal data that we process for this purpose is

- name;
- address;
- phone and email address;
- vehicle details
- finance agreement expiry dates

We only contact our customers when they have either consented to be contacted or that there is another lawful basis for the personal data to be processed.

We only retain personal data whilst we consider our customer to be actively interested in our products or services until they otherwise notify us in writing, either verbally, postal or electronically. This will be recorded on our management system database.

### Data we process concerning our company and customers

We hold personal data connected to our company and our customers for the purpose of keeping them informed about our products and services.

The personal data that we process for this purpose is:

- name of relevant contacts;
- business address; and
- other contact information (including telephone and business e-mail addresses).

We regularly review this data and delete data that we reasonably believe is no longer up to date.

We hold this data as a Data Controller.

### Data we process concerning our employees, contractors and job applicants

When individuals apply to work at TJ Vickers, we will only use the information supplied to us to process their application. If we wish to disclose information to a third party (e.g. where we want to take up a reference or obtain a criminal records check) we will first obtain the consent of the individual.

If a candidate is unsuccessful we will only hold his or her personal data for 12 months after the recruitment has been completed unless the individual authorises us to keep the data for a longer period.

Once an individual has become an employee or contractor of TJ Vickers, we will create an employment file to keep the employment contract and all other relevant records. The personal data that we hold shall only be used for purposes directly relevant to the individual's employment. After the individual's engagement with TJ Vickers has ended we will delete the information after 6 years unless there is any legal obligation to keep it for a longer period.

Our systems enable us to monitor telephone, email, voicemail, internet and other communications. Any employee or contractor's use (including personal use) of our systems may be monitored and/or intercepted by automated software or otherwise, as reasonably necessary in the interests of the TJ Vickers business, including for these purposes (the list is not exhaustive):

- monitoring and record keeping to establish facts;
- to establish compliance with regulatory or self-regulatory procedures;
- to prevent, detect or investigate alleged crime or wrongdoing;
- to investigate or detect the unauthorised use of the Company's systems or to ascertain compliance with the Company's policies, practices or procedures (including this policy);
- to locate and retrieve lost messages or files;
- to check whether communications are relevant to the business (for example when an individual is absent due to sickness or holiday); and/or
- to comply with any legal obligation.

We reserve the right to read or access any employee or contractor's emails or voicemails to check for business emails or calls while they are absent or out of the office. It may therefore be unavoidable that some personal messages will be read or heard.

We hold this data as a Data Controller.

## Data we process concerning our suppliers

We hold personal data concerning our suppliers for ordering new goods or services and for complying with our contractual obligations.

The personal data that we process for this purpose is

- name of relevant contacts;
- business address; and
- other contact information (including telephone and business e-mail addresses).

We regularly review this data and delete data that we reasonably believe is no longer up to date.

We hold this data as a Data Controller.

## **Sharing of data**

We never share any data with any third party. With the authority of our customer we may share their data with our contracted Vehicle supplier that is relevant to the vehicle they have purchased from our company.

## **Data transfers outside of the UK.**

We keep all personal data on our servers in the EU. We never transfer personal data outside of the EU.

## **Our data policies**

We carefully manage the personal data that we hold and use security measures to protect against loss, misuse or alteration of any information under our control.

We will never knowingly participate in marketing to an individual that has asked to not be contacted or any other activity that is in breach of relevant data protection laws.

We respect the rights of individuals to have their details removed, corrected or suppressed in any marketing database and ensure the unsubscribe process is as simple as possible.

We will maintain records of the data processing that we undertake.

For any enquires concerning your permission and privacy rights, either as a client, supplier, employee, contractor or recipient of a mail or call from us, please feel free to contact us.

## Rights to access data

We always aim to be as open as we can concerning allowing people access to their personal information.

Where we hold personal data as a Data Controller, individuals can make a 'subject access request' to us and if we do hold information about an individual, we will provide that individual with:

- a description of it;
- an explanation of why we are holding it;
- information about who it could be disclosed to; and
- a copy of the information in an intelligible form – unless an exception to the disclosure requirements is applicable.

If you would like to make a 'subject access request' please make it in writing to our contact email address and mark it clearly as 'Subject Access Request'. If we hold data about you as a Data Processor we shall forward your request to our relevant client as the Data Controller. We will provide the Data Controller with assistance in responding to a 'subject access request'

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

## Other rights

**Right to be forgotten** – If we hold data about you as a Data Controller but it is no longer necessary for the purposes that it was collected and cannot otherwise be justified – you have the right to request that we delete the data. If we hold the data as a Data Processor, we will assist the Data Controller with your request.

**Right to restrict data** – If we hold data about you as a Data Controller that you believe is inaccurate you have the right to request us to restrict the data until it is verified. You also have the right to request that the data is restricted where you have a right to it being deleted but would prefer that it is restricted. If we hold the data as a Data Processor, we will assist the Data Controller with your request.

**Right to withdraw consent** – You have an absolute right to withdraw consent to any direct marketing at any time. You may also request that other types of data processing are stopped. If we are processing the data as a Data Controller we will promptly consider your request and inform you of our decision. If it relates to data that we are processing as a Data Processor we shall refer your request to the relevant Data Controller and assist the Data Controller with your request.

**Right to have data ported** – If we are processing personal data you have provided to us as a Data Controller or if we are processing personal data for the fulfilment of a contract you have with us, you have the right to request that data is ported in a machine-readable format to another party. If we are processing this data as a Data Processor we shall assist the Data Controller with that responsibility.

**Right to complain** – You always have the right to complain to the personal data regulator, the ICO. You may also be entitled to seek compensation if there has been a breach of data protection laws.

## Definitions that we have used in this policy

Data Controller	means a person (or business) who decides how personal data shall be used;
Data Processor	means a person or business that processes personal data on behalf of and under the instructions of a Data Controller;
Personal Data	means information from which a living individual is identified or identifiable.

## Updates

This policy was last revised on 24<sup>th</sup> April 2025.