

APPLICABLE FOR: All Sites / Processes

**TITLE: PRIVACY POLICY**

Version	Date Issued	Brief Summary of Change	Owner's Name
1	26/01/2021	Creation	Lee Hughes
2	12/11/2021	Review and update	Lee Hughes
<b>Aim</b>	<p>Egertons Recovery Group Ltd (ER) are the largest independent Rescue, Recovery and Repair Company in the UK. ER provide vehicle Rescue, Recovery and Repair services from service centers across the Northern, Central and Southern geographical areas of the country.</p> <p>Every day Egertons Recovery Group Ltd will receive, use and store personal information about our customers, and colleagues. It is important that this information is handled lawfully and appropriately in line with the requirements of the Data Protection Act 1998/ 2018 (<a href="https://www.legislation.gov.uk/ukpga/1998/29/contents">https://www.legislation.gov.uk/ukpga/1998/29/contents</a>) and the General Data Protection Regulation 2016 (collectively referred to as the 'Data Protection Requirements').</p> <p>We take our data protection duties seriously, because we respect the trust that is being placed in us to use personal information appropriately and responsibly.</p>		
<b>Scope</b>	<p>This Policy, and any other documents referred to in it, sets out the basis on which we will process any personal data we collect or process.</p> <p>Egertons Recovery Group Ltd is responsible for ensuring compliance with the Data Protection Requirements, any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Officer/ Chief Information Security Officer or reported in line with the organisation's Whistleblowing Policy or Grievance Policy.</p>		
<b>Further Documentation</b>	<ul style="list-style-type: none"> <li>• ISO 27001:2013 Management System</li> <li>• Information Security &amp; Privacy Policy (IS 1801)</li> <li>• ISO 9001:2015 Management System</li> <li>• ISO 22301:2012 Management System</li> </ul>		
<b>Review and consultation process:</b>	To be reviewed annually through Management Review.		
<b>Classification:</b>	Unclassified/ Public Available		
<b>Distribution methods:</b>	Available on company website and shared company folder		

APPLICABLE FOR: All Sites / Processes

**TITLE: PRIVACY POLICY**

**BACKGROUND:**

Egerton Recovery understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, employees and partners and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

This privacy policy applies to:

- ER websites and webpages linking to this policy
- When you contact us by email, telephone, or by post
- When you post content or contact us through social media
- phone or the internet

**1. Information About Us**

Egertons Recovery Group Ltd registered in England under company number 07270006.

Registered/ Main trading address: Moss Lane Mobberley Knutsford Cheshire WA16 7BS.

VAT number: GB127294311

Data Protection Officer(S): Lee Hughes – Head of Risk and Compliance/ Deborah Kidger - Head of Human Resources and Les Brooke - Finance Director.

Email address: [DPO@egertonsrecovery.com](mailto:DPO@egertonsrecovery.com)

Telephone number: 01565 872707

Postal Address: Moss Lane Mobberley Knutsford Cheshire WA16 7BS

We are required to adhere to legislation, regarding personal data collection for third party agencies, for example the DVLA, DVSA.

**2. What Does This Policy Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

**3. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

**4. What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

APPLICABLE FOR: All Sites / Processes

**TITLE: PRIVACY POLICY**

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. we do not use your personal data in this way

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- [Name;]
- [Address;]
- [Email address;]
- [Telephone number;]
- [Business name;]
- [Job title;]
- [Profession;]
- [Payment information;]

## 6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email OR post that you have opted-in to (you may unsubscribe or opt-out at any time by Contacting DPO@egertonsrecovery.com)

With your permission and where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email OR telephone OR text message OR post with

APPLICABLE FOR: All Sites / Processes

**TITLE: PRIVACY POLICY**

information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Here you can find out more about how your information is used, as well as the legal basis we rely on to ensure your personal information is always processed fairly and lawfully.

How we use your information	For the performance of your contract with us	To comply with our legal and regulatory obligations	Processing necessary for our legitimate business interests	Where you give us your consent
To provide you with a quotation or price and to make you aware of the terms and conditions of the product or service	x			
Sharing information with other ER group companies necessary for the performance of your contract	x			
To receive payment of fees and premiums or to provide any reimbursement	x			
To uphold your data protection rights under the GDPR		x		
Processing or disclosing your information where law requires us to do so		x		
For marketing our own products or services where you have not opted out and for development of our marketing strategy, this may include the use of profiling techniques to identify products and services we believe you may be interested in			x	
To improve our services through the processing of market intelligence including testing, reporting, analysis and identification of improvements in products and processes			x	
For internal business processes and operations, including quality assurance, governance, accountancy, management and audit practices			x	
Use of cookies to monitor use of our website and for optimisation of user experience at device level			x	
To develop risk acceptance criteria, developing our pricing models and Calculating contract renewal quotations			x	
To recover debts owed to us, including where necessary obtaining contact information from third parties			x	
Where you have given us permission to collect or share certain personal information				x

APPLICABLE FOR: All Sites / Processes

**TITLE: PRIVACY POLICY****7. How Long Will You Keep My Personal Data?**

We will keep your information for as long as is necessary to provide the services or products you have requested, for our own legitimate interests and to meet our statutory obligations. Your information will always be kept in accordance with internal retention policies.

If you cancel any of your services, it will be necessary for us to retain your personal information for internal reporting and record keeping and in line with any legal or regulatory requirements. This period of retention is usually 7 years. In any situation where the retention period is longer, we will inform you of this.

**8. How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

**9. Do You Share My Personal Data?**

To administer and provide ER services we will share your information with other companies within the ER group, including.

Third parties instructed by us to provide services and products on our behalf, such as:

- Providers of IT services for web site administration and management of our internal systems
- Territorial contractors who provide breakdown and recovery services during busy periods
- Subcontractors and other specialists who help us provide products and services
- Parts and equipment providers to help us repair your vehicle when needed
- Hire car providers and onward travel

Fraud detection and crime prevention agencies organisations that help us with fraud protection and statutory law enforcement agencies.

Regulators and financial organisations necessary for meeting our mandatory reporting requirements, financial organisations such as banks that allow us to make or receive payments, our professional advisors and any regulatory or governmental body, (for example the FCA or ICO) or any other supervisory body with rules and/or codes of practice to which we are subject, which requests or requires access to your information.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

APPLICABLE FOR: All Sites / Processes

**TITLE: PRIVACY POLICY****10. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**11. Your right to lodge a complaint**

If you are concerned about the manner in which we process your personal information you have the right to complain to the Information Commissioner’s Office (‘the ICO’). The ICO anticipates that you will raise your concern with us in the first instance. For further information please go to [www.ico.org.uk](http://www.ico.org.uk) or call the ICO helpline on 0303 123 1113.

**12. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of Data Protection Officer:

Email address: [dpo@egertonsrecovery.com](mailto:dpo@egertonsrecovery.com)

Telephone number: 01565 872707

Postal Address: Moss Lane Mobberley Knutsford Cheshire WA16 7BS

**13. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available at <http://www.egertonsrecovery.com>