

## Clickndrive vehicle remarketing privacy policy 2022

# 1.About this policy

Clickndrive vehicle remarketing Ltd is a digital automotive marketplace that offers a vehicle trading platform for private individuals to sell their vehicles to motor dealers and motor dealers the opportunity to trade vehicles with each other on. A retailer may provide us with, and we may collect and process, certain personal information about the retailer (where the retailer is a sole trader/partner) or about people employed or engaged by that retailer. We will collect and process information about people who:

We also offer our Logistics partners the availability to take vehicle movements from our platform to assist our dealer partners with their vehicle transportation requirements

We offer private sellers and dealers the ability to track the value of their vehicle over time and to sell their vehicle to dealers who bid to compete (“**Services**”). We offer these Services through this website, Clickndrive Vehicle Remarketing “**www.clickndrive.co.uk**”.

We take your privacy seriously and we will only use your personal information in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation both as amended from time to time (together Data Protection Legislation). And other applicable laws and regulations that relate to data protection and privacy.

# 2.Changes to our policy

The contents of this policy may change from time to time. We will post any updates to this notice on our website [www.clickndrive.co.uk/privacy-policy/](http://www.clickndrive.co.uk/privacy-policy/). You may wish to check this page to ensure you are still happy to share your personal data with us. Where we make material changes to this policy, we will also contact you directly to notify you of these changes.

## 3. Information we process about you

When you take up our Services or use the Website, we will collect certain information about you, such as:

Personal data means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or technical data about a vehicle. We collect and process personal data about you which we have grouped together into different types of data to make it easier for you to understand what we do with your personal data and what our legal basis is for processing the personal data.

Details of how we process your personal data and why are set out in Section 10 (How we will use your personal data, and our basis for doing so) and details of the legal bases we rely on to process your personal data, are set out in Section 9 (What is the legal basis for processing your personal data):

**Contact Data** – details of your name(s), home address, previous home address, home phone number (including mobile), home email, work address, work phone numbers (including mobile) and social media user name/identifier;

**Identity Data** – details of your passport, drivers license, date of birth, utility bills, national insurance number and nationality.

**Financial Data** – details of your bank account, bank statements, payment card details, vehicle purchase agreement, outstanding finance documents. If you to subscribe on our monthly plan your bank details for example, will be required to set up a payment plan by direct debit; Once we have created your account, you may also provide us with certain additional information about yourself which forms part of your account, such as banking details for your payment subscription and other services you may be interested in.

**Transaction Data** – details about payments to and from you and other details of products and services you have purchased from us;

**Website Data** - our web servers store as standard details of your browser and operating system, the website from which you visit our websites, the pages that you visit on our websites, the date of your visit to the website, web browsing behaviour, demographics and statistics and the internet protocol (IP) address assigned to you by your internet service provider. For more details about how we collect your personal data through the use of cookies please see Section 16 (Cookies and how we use these to process your personal data);

**Audio Data** – details of telephone voice calls maybe recorded for monitoring, dispute resolution and training purposes when you contact us or we contact you from our dealership landlines and/or our contact centres. Outbound mobile telephone calls or calls made from video calling apps are not recorded. Recorded telephone calls are not held for more than 12 months;

**Social Network Data** – details of personal data that is part of your public profile on a third party social network may be collected if you like, follow, message, share content, post opinion or comment on any of our Clickndrive social media pages;

**Family Data** – details of your direct family such as their name for example to sell a vehicle for them and allow the vehicle to sold;

**Chat Data** – conversations you may have with our digital teams via live chat windows on our websites, text messages or apps. We do not retain chat data on our systems after the conversation is terminated;

**Analytics Data** – this is personal data on how you interact with us, this may relate to your vehicle choice or current vehicle, how you use and engage with our services, apps or websites

**As a whole** we do not collect the following special categories of personal data about you, details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health or genetic and biometric data.

**We also collect** -, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated or anonymous data may be derived from your personal data but is not considered personal data in law as this data does not directly or

**Private Seller documentation** - If you choose to sell your car through the Clickndrive platform, we will use our document capture feature to collect further information relating to your car, including photographs or scans of the following documents: V5 form, driving license, proof of purchase invoice, and finance settlement letters.

As part of our fraud prevention efforts, we may also ask you to provide photographs or scans of the following through our document capture feature: death certificate (if you are selling on behalf of a registered keeper who is deceased), signed letter of consent from the registered keeper, driving license of registered keeper, and/or proof of address. The above documents may include the following categories of personal information: name, address, date of birth, signature, photograph, and bank or credit card information.

### **General vehicle information**

Whether you are planning on selling your car through our platform or are a dealer looking for an underwrite, we will ask for certain information about your car. This may

include but is not limited to images of the car, the make, model, age, mileage, technical vehicle information, vehicle registration number, and/or vehicle identifier number (usually found on the driver's side door).

## **Records of how you use our Services**

This may include details of your use of our website (captured through cookies and similar tracking technologies), your car's make, model and mileage, its valuations over time and, if you complete a sale through our platform, a record of that sale.

# **How we use your personal information**

**Private Sellers** - In order to provide you with the Services you have requested, we need to collect your information and, where you enquire about selling your car with us, we will share it with our Motor Dealer Partners in order to: confirm the identity of the registered owner of the relevant car; confirm details relating to your car (or the car for which you are using our services), including with respect to ownership; provide you with up-to-date bids for your car, providing you with live bids from different Motor Dealer partners who may be interested in purchasing your car (where you have agreed to put it up for sale through our platform); connect you with Motor Dealer partners who are interested in purchasing your car, whether this is a preferred Motor Dealer partner we choose as the most relevant for you and to create and manage your account so you can easily access your valuations.

## **To confirm your authority to sell your car and to prevent fraud**

In some cases, we will use the photographs or scans of documents which you submit to us to ascertain your right to sell a given car, and to prevent fraud.

## **Making payment to you**

We will collect and share your bank account details with either the relevant Motor Dealer or our third party payments provider, in order to facilitate payment to you of the proceeds of the sale of your car.

## Communication

We will provide confirmation of Motor Dealer Partners Underwrites/Bids/Sales by email and portal notification after you complete. We will remind you about your sale from Motor Dealer Partners for a set period following a valuation/Bid, if you haven't sold your car through our platform (note that offers expire after 7 days so you will need to re-value your car to receive up-to-date offers). If you haven't sold your car through our platform, we will sometimes remind you to re-value your car, if we consider there to be preferential offers or times to sell your car. We will provide you with customer support and answers and/or respond to any queries or feedback that you send to us. To assist you with any technical problems you have with the Services or Website. To collect reviews of our Services and those of our Motor Dealer Partners in order to improve our business. To update you with any changes to our terms and conditions / other policies.

## Vehicle collection and transportation

Method of collection shall be an option of driven and transported through the logistics portal, Once the vehicle has been agreed in as a sale, the purchaser shall have an option to list on the the logistics part of the portal to organize the vehicle movement. Once the transport is completed by the accepting Transport company they shall invoice the receiving Motor Dealer directly at the agreed cost of acceptance.

## Our Service Providers

We use carefully selected service providers, which process personal information about you on our behalf, as described below:

- **Data storage providers:** Such providers help operate the functionality of the Website and enable us to provide user accounts. They also provide backup, debugging and logging purposes.
- **Content and data providers:** Such providers assist us to, for example, verify your email address and telephone number, use your town / city to calculate routes between you and our Motor Dealer Partners, obtain your MOT records, and use your postcode to geocode your approximate location.

- **Customer management and support providers:** Such providers may support you with the sales process for your car, over the phone. They may also deliver personalised email or SMS reminders to you in relation to your vehicle underwrite/bid/sale, and collect customer reviews of our Services.
- **Transport providers:** Such providers may be engaged by us and/or our Motor Dealer Partners to carry out the collection and transport of your car. In order to provide the transportation services, they will receive your address, your contact details, details of the condition and appraisal of your vehicle, photographs of your vehicle, and scans of any vehicle-related documents.
- **Payment providers:** Such providers ensure you receive the proceeds from the sale of your car.
- We may also share your personal information with third parties in other circumstances:
- in the event that we sell or buy any part of our business or its assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets, along with its professional advisers;
- if required, in order to obtain professional advice concerning a complaint, claim or potential claim relating to you; and
- where we are required to comply with certain legal and regulatory requirements, and may process your personal information for compliance with such legal or regulatory obligation, to which we or regulators or law enforcement agencies are subject.

# Storage of your personal information

Information about you may be transferred outside the UK to a country, territory or international organisation that may not have UK equivalent data protection standards. This may be when we transfer your personal information to our trusted third party service providers (for the purposes described above) outside of the UK and European Economic Area.

In such cases, we will ensure that your personal information is protected by implementing appropriate safeguards. This includes assessing the risk and protections afforded by laws in any third country, having in place appropriate technical and organisational measures to protect your personal information, and enforcing strong contractual commitments with our third party service providers. assessing the. If you would like more information about any of the transfer safeguards on which we rely please contact us using the details set out in this privacy policy.

## How do we protect your personal information?

We implement appropriate technical and organisational measures to protect personal information that we hold from unauthorised disclosure, use, alteration or destruction. Where appropriate, we use encryption and other technologies that can assist in securing the information you provide. We also require our service providers to comply with strict data privacy requirements.

## How long will your personal information be kept?

The period for which we may retain information about you will depend on the purposes for which the information was collected, whether you have requested the deletion of the information, and whether any legal obligations require the retention of it (for example, for regulatory compliance). We will not retain information about you for longer than is necessary to fulfil the purposes for which it was collected.

# Your rights

You may have some or all of the following rights in respect of the information about you that we process:

- the right to request us to give you access to your personal information;
- the right to request us to rectify it, update it, or erase it;
- the right to request us to restrict our using it, in certain circumstances;
- the right to object to our using it, in certain circumstances;
- the right to withdraw your consent to our using it;
- the right to have your personal data transferred to a third party, in certain circumstances;
- the right to opt out from our using it for direct marketing; and
- the right to lodge a complaint with the Information Commissioner's Office, which is responsible for upholding your data protection rights in the UK.

## Contact Information

For the purpose of UK data protection laws, the controller of your personal information when you use our Website and/or Services is Clickndrive vehicle remarketing Ltd (Company Number 14360016) of 4 Queen street, Newcastle Under Lyme, Staffordshire, ST51ED .If you have any questions, or wish to exercise your rights, please contact us at any time on 01782461234 or email: [privacy@clickndrive.co.uk](mailto:privacy@clickndrive.co.uk).

