

# Privacy Policy

## Introduction

This Privacy Policy ("Policy") describes what types of personal data The Data Company Group Ltd (referred throughout the Policy as "TDC", "we", "us" or "our") collect from you, when, how and why it is collected, used and disclosed and how it is kept secure when you use our website.

It is important that you read this Policy before we collect or process personal data about you so that you are fully aware of how and why we are using your data. This notice supplements our Terms of Use and is not intended to override them.

Our website and our services are not intended for children and we do not knowingly collect personal data relating to children. If you are under 18, please do not provide us with any of your personal data.

## Changes to this Policy

The contents of this Policy may change from time to time. We will post any updates to this notice on our website. You may wish to check any changes to this Policy to ensure you are still happy to share your personal data with us.

## Processing another person's personal data

If you provide us with personal data on behalf of someone else (e.g. you provide your spouse's name), you confirm to us that you have their permission to pass their personal data to us and that they are aware of the contents of this Policy and do not have any objection to our processing their personal data in accordance with this Policy.

## Who is the controller for my personal data?

A 'controller' is a person or organisation who decides why and how your personal data is collected, used and shared. They are responsible for ensuring that the processing complies with data protection legislation.

## What personal data do we collect about you?

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). 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 the section below entitled *Why we process your personal data* and details of the legal bases we rely on to process your personal data are set out in the section below entitled *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);
- Identity Data – details of your passport, drivers licence, date of birth, utility bills, national insurance number;
- Financial Data – details of your bank account, bank statements, vehicle purchase agreement, your employment history and salary if required as part of your finance application;
- 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, profiling 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 the section below entitled *Cookies*.

We do not collect data 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. Nor do we collect any information about criminal convictions and offences.

We do collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we will not be able to perform the service.

### **Where do we get your personal data from?**

#### Personal data you have given to us

We collect personal data when you provide this to us directly in the scenarios listed below:

- by entering personal data via our website or when you contact us for technical support;
- when you complete customer surveys or provide feedback;
- when you apply for a loan, personal contract purchase or lease agreement via our website from Motor Market Limited to purchase your vehicle;
- to handle complaints or to provide information you have requested.

We share your personal data with CrediCar Limited, Motor Market Limited and Motor Market Limited's accredited finance providers for the following purposes:

- To conduct finance pre-approval and eligibility checks before you submit your finance application (CrediCar's Privacy Policy can be found [here](#)).
- to administer your finance application on your behalf with Motor Market Limited's accredited finance providers;
- to allow you to facilitate funding to purchase a vehicle.

We process information relating to your finance application on behalf of Motor Market Limited's approved finance providers who are acting as data controller.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation (e.g. by sharing your personal information with the DVLA), to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers. However, we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

We do not sell your personal data to third parties. However, we may from time to time disclose your personal data to our legal and other professional advisors.

We take steps to ensure that any third-party partners who handle your personal data comply with data protection legislation and protect your personal data just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your personal data or use aggregated non specific data sets wherever possible.

### **What is the legal basis for processing your personal data?**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Contractual performance – where we need to process your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Legal or regulatory obligation – when we have to process your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- Legitimate interest – when it is in our legitimate interest (or that of a third party) and those interests do not override your rights and freedoms, for example when it is in the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us using the contact details set out in the section above entitled *How to contact us or make a complaint*.
- Consent – generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by us using the contact details set out in this notice.

#### **Why we process your personal data**

We have set out below a table setting out descriptions of all the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. We may also process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

#### **When you are making an enquiry for finance**

<b>Processing Activity</b>	<b>Type of Data</b>	<b>Legal Basis</b>
When you enter your personal information in our website to enquire about finance, your personal data will be forwarded to Motor Market to follow up your request.	Contact data	Legitimate interest

#### **Purchasing a vehicle with Finance**

<b>Processing Activity</b>	<b>Type of Data</b>	<b>Legal Basis</b>
To administer and arrange finance for you to purchase or lease a vehicle	Contact data / Vehicle data / Identity data / Financial data	Legal or regulatory obligation / Legitimate interest
TDC will share your personal details into CrediCar's system which will allow CrediCar to conduct a soft credit check and in some cases an affordability assessment on you so we can provide you with an indication of your pre-approval/eligibility.	Contact data / Vehicle data / Identity data / Financial data	Contractual performance / Consent
If your application for finance is declined by the finance provider, we will advise you of this and obtain your consent before allowing you or Motor Market to send your personal information to another lender for consideration.	Contact data / Vehicle data / Identity data / Financial data	Consent

#### Processing necessary for us to engage with customers

<b>Processing Activity</b>	<b>Type of Data</b>	<b>Legal Basis</b>
To identify and record when you have received, opened or engaged with our website or electronic communications.	Contact data / Website data	Legitimate interest
To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand customer needs	Contact data	Contact data
We will send a customer survey to you following your vehicle purchase to gain your feedback about our products and/or services provided	Contact data	Legitimate interest
For general administration including managing your queries, complaints, or claims.	Contact data	Contractual performance/ Legitimate interest

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively.	Contact data	Contractual performance
For network and information security purposes i.e. in order for us to take steps to protect your personal data against loss, damage, theft or unauthorised access.	Contact data	Legal or regulatory obligation
To comply with a request from you in connection with the exercise of your rights	All types of data depending on the request	Legal or regulatory obligation
To inform you of updates to our terms and conditions and policies	Contact data	Legal or regulatory obligation

### Third party links contained on our website

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices and statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### Cookies and how we use these

A 'cookie' is a piece of information that a website transfers to the cookie file of the browser on your computer's hard disk, so that the website can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the 'lifetime' of the cookie, and a value, usually a randomly generated unique number. You can accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our websites if cookies are disabled. You can restrict the type of cookies being placed on your hard drive when browsing our website by clicking on the button 'change cookie settings' at the bottom of the web page.

### Data retention

#### How long will you use my personal data for?

We will keep your data as long as we are providing services to you or on your behalf. Following the conclusion of providing services to you or on your behalf, we will delete or anonymise your data within 90 days unless required by law to keep it longer.

You have the right to ask us to delete your personal data - known as your Right to Erasure or Right to be forgotten. To exercise this right please contact our Data Protection Officer by emailing [support@simplyquote.me](mailto:support@simplyquote.me). As per regulation, we will respond to these requests within one month of receiving them.

We retain our right to keep anonymised records of your interactions with us for research, training or statistical purposes. Anonymised records will no longer be associated with you.

### **When personal data is transferred outside the European Economic Area (EEA)**

We do not currently share your personal data with anyone outside of the EEA. If this changes we will inform you in writing.

### **Your rights**

Your personal data is protected by legal rights, which include your rights to:-

- object to our processing of your personal data;
- request access to your personal data that we hold about you, or to get a copy of it;
- request that we amend, update or correct inaccurate data;
- request that your personal data is erased or that its processing be restricted;
- object to our controlling and processing your personal data;
- request that we transfer your personal data to another lender;
- object to our sharing of your personal data with others or with certain organisations;
- request that we confirm what personal data we currently control and/or process in relation to you; and
- withdraw any consent you have previously given us.

To execute your legal rights on any of the above, please contact us by emailing our Data Protection Officer and Data Controller at [support@simplyquote.me](mailto:support@simplyquote.me) or by writing to us at 7 Merlin Courtyard, Gatehouse Close, Aylesbury, Buckinghamshire, England, HP19 8DP.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

There may be reasons why we need to keep or use your data, but please tell us if you think we should not be processing your data.

If you are unhappy about how your personal data has been used, you may raise a complaint. Our complaints procedure is available on our website or you can contact us on the details above and we will send you a copy of it.

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data. You can contact them at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, on 0303 123 1113 or by email to [mcasework@ico.org.uk](mailto:mcasework@ico.org.uk). See also <https://ico.org.uk/global/contact-us/>.