

Automotive Software Solutions Limited

Privacy Notice V1.3/2023

This Privacy Notice explains how Automotive Software Solutions collects, uses, shares and otherwise processes your Personal Data in accordance with applicable data privacy laws, in particular the DPA 2018 and the General Data Protection Regulation ("GDPR").

The information published here applies to the personal information (also known as 'Personal Data') that we collect about:

- Visitors to our website
- Subscribers to our online systems

What is Personal Data?

The term "Personal Data" as used in this Data Protection Privacy Notice means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute Personal Data, including name, date of birth, residential address, identification number, location data or online identifier. Personal Data does not include data from which you can no longer be identified such as anonymised aggregate data.

What are cookies and how do we use them?

Cookies are small text files that can be used by websites to make a user's experience more efficient. This website uses cookies which are unique to your web browser. They will contain some anonymous information such as a unique identifier, IP Address and preferences. We use cookies to analyse our traffic. Please see the Cookie policy for further details

How do we collect personal data and what kind of information do we collect?

General browsing will utilise cookies as outlined above. In the event you register with us or fill out a subscribe or contact us form, the kinds of Personal Data we may collect include information such as:

- your contact details (such as your address, email address and telephone number) and other information such as your job title.
- other materials we may need for our identification and compliance obligations; and
- complaints or disputes you may have had with us and details of the underlying transaction (where applicable);
- sales and marketing information;
- financial information and transactions records;
- records of correspondence and other communications between you and Automotive Software Solutions representatives;
- information that we need to support our regulatory obligations;

What do we do with your data?

We will process your Personal Data if and to the extent applicable law provides us with a lawful basis to do so. Therefore, we will only process your Personal Data on the following grounds:

- Consent - you have consented to us using your data
- Contract - we need it to perform the contract we have entered into with you
- Legal Obligation - we need it to comply with a legal obligation.

Legitimate Interest - we have a legitimate interest which is not overridden by your interests or fundamental rights and freedoms. Legitimate interest may include the provision of services by us, administrative or operational processes within Automotive Software Solutions and certain direct marketing activities. We will use your Personal Data to deliver services to you and/or to work or act for you. We may also use your Personal Data to inform you about us and our services or otherwise communicate with you.

Please note that we may use or disclose Personal Data if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

What might we need from you?

We may need to request specific information from you to help us confirm your identity and ensure your right of access to your Personal Data (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

Accuracy of information

It is important that the Personal Data we hold about you is accurate and current. Please let us know promptly if your Personal Data changes during your relationship with us.

What if you do not provide the Personal Data we request?

It is in your sole discretion to provide Personal Data to us. If you do not provide us with all or some of the Personal Data we request, we may not be able to send you information about us (e.g. marketing materials), accept an engagement from you to provide all or some of our services or, to enter into a contract with you.

Change of purpose and anonymisation

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 which is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

With whom will we share your information?

When using your Personal Data for the purposes and on the legal basis described above we may share your Personal Data with other service providers we work with. These are 3rd parties that provide our technical platforms and as such we have verified that the appropriate level of security is applied to all data processing activities. Currently all our data centres are UK based.

Keeping your personal data secure

We take the safety and protection of your personal data very seriously and take all reasonable steps to ensure your data is protected. We work with our IT and storage providers to ensure they can provide ongoing confidentiality, integrity, availability and resilience of processing systems and services.

Your data will only be accessed by our staff and third parties where authorised to do so. We will work with our IT and storage providers and own internal staff to ensure appropriate organisational and technical measures are taken against any unauthorised or illegal processing of your personal data, including the accidental loss of or damage to it.

We have worked to ensure we have the technology, procedures and appropriate training of relevant individuals to keep your personal data secure and safe from when we collect it until it is no longer processed or required or removed at your request.

Your rights in relation to your information

You have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. These rights are to:

request access to your Personal Data (commonly known as a "subject access request") and request certain information in relation to its processing;

- request rectification of your Personal Data;
- request the erasure of your Personal Data;
- request the restriction of processing of your Personal Data;
- object to the processing of your Personal Data.
- request the transfer your Personal Data to another organisation, or directly to you, under certain conditions.

You also have the right to make a complaint at any time to the data protection regulator. If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

If you wish to receive a copy of personally identifiable data we store about you, this can be made available on request. Once we have verified your identity, we will supply you with a digital record of all your personal data as soon as we can, but in any event, it will be within one calendar month.

We will not charge you for supplying copies of your personal data in the first instance. However, in the event we find data subject access requests to be manifestly unfounded or excessive, particularly where repetitive, we will need to consider the effort required to handle such requests and charge a reasonable administrative fee.

Right to withdraw consent

In case you have provided your consent to the collection, processing and transfer of your Personal Data, you have the right to fully or partly withdraw your consent. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. In case we processed your Personal Data for direct marketing purposes, you have the right to object at any time, in which case we will no longer process your Personal Data for such marketing purposes.

How long will we retain your information?

We will only retain your Personal Data for as long as is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory,

accounting or reporting requirements, or to enforce our terms and conditions or for the protection of our rights in the context of legal claims, litigation, arbitration or similar proceedings.

To determine the appropriate retention period for your Personal Data, we will consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

Upon expiry of the applicable retention period we will securely destroy your Personal Data in accordance with applicable laws and regulations.

[Further information](#)

In our capacity as data controller, if you have any queries, questions, concerns or require any further information in relation to the Privacy Notice or you wish to exercise any of your rights, please do not hesitate to contact us at compliance@ukvehicledata.co.uk

[Changes to this Privacy Notice](#)

Automotive Software Solutions reserves the right to update this Privacy Notice at any time, and we will make an updated copy available on our website. This Privacy Notice was last updated in February 2023