

HOLMFIELD MOT AND REPAIRS LTD/606 GDPR PRIVACY POLICY

This privacy policy applies to personal information processed by or on behalf of Holmfield mot and repairs Ltd.

Holmfield mot and repairs/606 Recovery is strongly committed to protecting personal data. This privacy policy describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy policy or as otherwise stated at the point of collection.

Personal data is any information relating to an identified or identifiable living person. 606 Recovery processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

Who we are

606 Recovery (referred to as 'we', 'us' and 'our'), is a 24 hour car and commercial breakdown and recovery company.

We are regulated under the data protection and privacy laws which apply across the European Union (including those in the United Kingdom), and we are responsible as a 'Controller' of that personal information for the purposes of those laws.

We are registered with the ICO and our registration number is ZA386510.

We collect, store and use the following personal information when you provide it to us:

Name and Contact Data:

We collect your title, first and last name, email address, postal address, phone number, job title or role, company name, and / or other similar contact information.

Date of birth, gender and /or age, nationality:

This may be linked to an employee or if needed for the service that we provide.

Credentials:

We may collect usernames, password hints and/or other similar security information for the authentication and access to accounts or services in the running of the business.

Records of your contact with us:

This could be via phone, mobile, fax, social media, email, IP address, electronic deployment systems.

Products and services:

We hold information on the products and services that we have provided to you and any associated payment methods used.

The usage of our services:

Any call outs and provision of service including outcomes and relevant details associated with this.

Vehicle information:

This includes make and model, registration, faults, repairs, parts, repair costs, recovery destinations, storage and disposal.

Telematics and driving information:

-about your vehicle, which may include assessing and predicting faults or issues and driving style, such as improvements and any risks associated with your driving style, location and routes to be taken.

Customer property:

We keep information and records on any property that we may store and dispose of including collection of / postage of and payment of release.

Information about your use of products or services held with our suppliers:

such as parts, warranties, disposal or end of life.

Information we obtain from third parties:

This is information that we are provided with by a third party, law enforcement or company that you are subscribed to, with the objective of providing you with a service or assistance.

Personal information which we obtain from Credit Reference Agencies and Fraud Prevention Agencies:

We may be provided with or seek clarification on credit history from an agency (or public authority).

Fraud and theft information:

This would be provided by a law enforcement to notify us that there may be special requirements for the handling or storage of a vehicle and/or your property which may include suspected instances of fraud or theft, and details of any devices used for fraud.

Criminal records information:

A copy of your driving license may be taken as proof of identity to support ownership of a vehicle. Disclosure checks and copy of driving license, including any offences will be taken as required to support our customer contracts and validation that our employees and sub-contractors are legal to drive.

Information about your health or if you are a vulnerable customer:

This would be provided by our customers and recorded on our operating systems to ensure that needs are met during the delivery of service.

Information about your property:

This would be in the context of personal property such as any items that may be left in a vehicle.

Your residency and/or citizenship status:

This would only be requested in the event of a job offer with the company and if relevant, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK.

Third party transactions:

Such as where a person other than the customer is using the service or acting on behalf of that customer.

Financial details:

Taken only when payments are needed for parts, storage fees, recovery costs and any other accounting functions that are contractually and lawfully required.

Comments and Feedback:

We retain information when you make enquiries or provide comments or feedback on our services. We collect personal data when an individual gets in touch with us with a question, complaint, comment or feedback (such as name, contact details and contents of the communication). In these cases, the individual is in control of the personal data shared with us and we will only use the data for the purpose of responding to the communication.

Business contacts

Holmfield mot and 606 Recovery may process personal data about business contacts (existing, former and potential customers and/or individuals associated with them). This information is used purely to manage the contractual and business accounts that have been established.

What we use this personal data for:

The data relating to business contacts may be visible to and used by Burrows users to learn more about an account or customer and may be used for the following purposes:

- Administering, managing and developing our businesses and services
- Providing information about us and our range of services
- Making contact information available to Burrows users

Business Contact Data retention

Personal data will be retained by Burrows for as long as it is necessary for the purposes set out above (e.g. for as long as we have, or need to keep a record of, a relationship with a business contact).

Employees

We collect personal data concerning our own employees as part of the administration, management and promotion of our business activities. Employees should refer to General Manager for information on why and how personal data is collected and processed.

Customer Data

We collect only the personal data necessary for agreed purposes and contractual agreements and we ask our customers to only share personal data where it is strictly needed for those purposes.

Generally, we collect personal data from our customers or from third parties acting on the instructions of the relevant customer.

What we use this personal data for:

We use personal data for the following purposes:

Providing Services

We provide a breakdown and recovery service, and this requires us to process personal data in order to provide this.

Information collected from other sources

Occasionally we may receive personal information from third party sources and these may include: Name, contact details, address, vehicle type and registration, fault, location and any special needs or relevant information.

Administering, managing and developing our businesses and services

We process personal data in order to run our business and this includes:

- managing our relationship with customers and potential customers
- managing our relationship with our suppliers and contractors
- developing our businesses and services (such as identifying customer needs and improvements in the delivery of our services)
- maintaining and using IT systems
- administering and managing our website and systems and applications

Security, quality and risk management activities

We have security measures in place to protect our and our customers' information (including personal data), which involve detecting, investigating and resolving security threats.

Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails.

We monitor the services provided to customers for quality purposes, which may involve processing personal information about our services and manage risks in relation to customer engagements.

We collect and hold data stored on the relevant Apex, and SAGE accounting system and we have policies and procedures in place to monitor the quality of personal data as part of our customer engagement and acceptance processes. As part of this we may undertake searches using publicly available sources (such as internet searches and credit checks) to check that there are no issues that would prevent us from working with a particular customer.

Providing our customers with information about us and our range of services

We do not use customer contact details to provide information that we think will be of interest about us and our services. This information would be advertised on our website.

Complying with any requirement of law, regulation or a professional body

As with any provider of public services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 7 years.

Suppliers and contractors

We collect and process personal data about our suppliers (including subcontractors and individuals associated with our suppliers and subcontractors) in order to manage the relationship, contract, to receive services from our suppliers and, where relevant, to provide services to our customers.

What we use this personal data for:

We use personal data for the following purposes:

Receiving services

We process personal data in relation to our suppliers and their staff as necessary to receive the services. For example, where a supplier is providing us with facilities management or other outsourced services, we will process personal data about those individuals that are providing services to us.

Providing services to customers

Where a supplier is helping us to deliver services to our customers, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our customers.

Monitoring suppliers

We have processes and procedures in place to monitor the quality of our services and manage the risks in relation to our suppliers. We collect and hold personal data as part of our supplier management process and we monitor the services that they provide for quality purposes. This may involve processing personal data.

Visitors to our offices and sites

CCTV operates on the perimeters and offices of the building complex and images captured are securely stored and only accessed on a need to know basis by the building proprietor regarding an incident. Signs are clearly visible that CCTV is in operation.

All visitors are required to report to the main reception area which is accessible by authorised personnel only.

Visitors to our website

Visitors to our website are generally in control of the personal data shared with us.

An email ID is located on the website should visitors wish to contact us. Their messages will contain information that they have consented to send to us.

If you do contact us, we ask that you do not provide sensitive information in your emails (such as race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records) to us when using our website; if you choose to provide sensitive information to us for any reason, the act of doing so constitutes your explicit consent for us to collect and use that information in the ways described in this privacy policy or as described at the point where you choose to disclose this information.

Cookies

We do not use cookies on our website.

Our website does not collect or compile personal data for the dissemination or sale to outside parties for consumer marketing purposes or host mailings on behalf of third parties.

Links to other websites

Our website does not have any links to any third-party website.

Who we share your personal information with

606 Recovery will only share personal data with relevant parts of the Company for business purposes only. This is restricted to authorised users in a secure and controlled environment.

We further share your personal data with third party suppliers who provide support to our business and customers and who act on our behalf. This is to provide products and services that you have requested.

We may share personal data with vendors or agents working on our behalf whom we have hired to provide us with customer service support or assistance to protect and secure our systems and services.

In all cases such companies are required to abide by our privacy and security requirements and are prohibited from using personal data received from use for any other reason.

We will share personal information with law enforcement or other authorities if required by applicable law, or in order to respond to a valid legal process.

Keeping your information secure

We are committed to protecting the security of personal data and ensure the ongoing confidentiality, integrity, availability and resilience of our processing systems. We also have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way.

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Whilst data transmission over the internet is inherently insecure (such that we cannot guarantee the security of data transmitted by this means), all electronic communications from us shall be encrypted.

Transfer of data

We will only share personal data with others when we are legally permitted to do so or if this is contractual. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

- **Third party organisations that provide applications/ functionality, data processing or IT services to us**

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them.

- **Third party organisations that otherwise assist us in providing goods, services or information**
- **Auditors and other professional advisers**
- **Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation**

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

Changes to this privacy policy

This privacy policy will be reviewed on a regular basis and was last updated on the 9th January 2019.

How to contact us

Please contact info@606recovery.co.uk if you have any questions regarding this policy or the information that we hold about you.

606 Vehicle Recovery
Unit 3 Holmfield Industrial Estate
Halifax
HX2 9TN

Phone: 01422 248180

Individuals rights

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights. Where we decide how and why personal data is processed, we are a data controller and include further information about the rights that individuals have and how to exercise them below.

Access to personal data

You have a right of access to personal data held by us as a data controller. This right may be exercised by emailing us at info@606recovery.co.uk

We may charge for a request for access in accordance with applicable law. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits (currently 40 days).

Amendment of personal data

To update personal data submitted to us, you may email us at info@606recovery.co.uk, or, where appropriate, contact us via the relevant website contact page.

When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make corrections (where appropriate) based on your updated information.

Withdrawal of consent

Where we process personal data based on consent, individuals have a right to withdraw consent at any time. We do not generally process personal data based on consent (as we can usually rely on another legal basis). To withdraw consent to our processing of your personal data, please email us at info@606recovery.co.uk

Other data subject rights

This privacy policy is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and amendment referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability. If you wish to exercise any of these rights, please send an email to info@606recovery.co.uk

Complaints

We hope that we can resolve any query or concern about our use of information, however if you do feel that you need to complain please email info@606recovery.co.uk and we will respond to your request.

You also have the right to lodge a complaint with the Information Commissioner's Office (“ICO”) (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the [ICO website](#).