

AXLE GROUP HOLDINGS LIMITED

WEBSITE PRIVACY POLICY

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Introduction

Welcome to the Axle Group Holdings Limited's privacy notice.

The Axle Group Holdings Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy here [INSERT LINK]. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- 1. [IMPORTANT INFORMATION AND WHO WE ARE]**
- 2. [THE DATA WE COLLECT ABOUT YOU]**
- 3. [HOW IS YOUR PERSONAL DATA COLLECTED]**
- 4. [HOW WE USE YOUR PERSONAL DATA]**
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- 9. [YOUR LEGAL RIGHTS]**
- 10. [GLOSSARY]**

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Axle Group Holdings Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you request the provision of our goods and/or services, update your company details, make a general enquiry or request to join our fleet network..

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Axle Group Holdings Limited (company number: SC240346 and registered office: 26-32 Millbrae Road, Glasgow G42 9TU) is made up of different legal entities namely National Tyre Service Limited trading as National Tyres and Autocare and National Fleet (company number: 00986754 and registered office at Regent House, Heaton Lane, Stockport SK4 1BS) and Stepgrades Motor Accessories Limited trading as Viking Wholesale Tyres (company number: SC053223 and registered office: 26-32 Millbrae Road, Glasgow G42 9TU).

This privacy notice is issued on behalf of the Axle Group Holdings Limited ("AGHL") so when we mention "AGHL", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the AGHL responsible for processing your data. National Tyre Service Limited (trading as National Fleet) is the controller and responsible for this website.

We have appointed a data protection manager (DPM) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPM using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Axle Group Holdings Limited

Name or title of DPM: Andrew Porter

Email address: dpm@axlegroup.co.uk

Postal address: 26-32 Millbrae Road, Glasgow G42 9TU

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This 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 statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier and title.
- **Contact Data** includes billing address, delivery address, home address, email address, fax number and telephone numbers.
- **Financial Data** includes bank account and payment card details (please note that all online transactions are conducted through a secure payment processing system) and may include information about your credit history (if applying for credit).
- **Transaction Data** includes details about the services you may have requested or used in the past and vehicle details.
- **Business Data** includes your business details or the details of the company that you work for and your role or job title (this data may be classed as personal data on some occasions).
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, services requested, purchases or orders made by you, your business, your employer or your rental or contract hire provider including vehicle details where relevant, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also 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. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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.

When you visit us we may use CCTV for crime prevention purposes.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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, your business, your employer or your rental or contract hire provider and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you, your business, your employer or your rental or contract hire provider (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you, your business, your employer or your rental or contract hire provider has with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Business Data by filling in forms or by corresponding with us by post, phone, email, in person when you may have been visited by our account managers or when visiting our retail branches, head offices or otherwise. This includes personal data you provide when you:
 - enquire about our goods or services;
 - apply for our goods or services and transact with us generally;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - join our fleet network;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [LINK] for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources.
 - Identity and Contact Data from publicly available sources such as VRM look up service.
 - Identity, Contact, Business and Financial Data from credit reference or fraud prevention agencies and Companies House.

4. How we use 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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [[here](#)] to find out more about the types of lawful basis that we will rely on to process your personal data.

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 contacting us (INSERT LINK TO DPM DETAILS).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us (INSERT LINK TO DPM DETAILS) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you, your business or your employer or your rental or contract hire provider as a new customer	(a) Identity (b) Contact (c) Business	Performance of a contract with you, your business, your employer or your rental or contract hire provider
Assessing your or your businesses credit worthiness and associated activities.	(a) Identity (b) Contact (c) Business (d) Financial (e) Transaction	(a) Necessary for our legitimate interests (to assess your credit worthiness) (b) Necessary to comply with a legal obligation

<p>To process and deliver the services to you, your business, your employer or your rental or contract hire provider or to transact with you, your business, your employer or your rental or contract hire provider</p>	<p>(a) Identity (b) Contact (c) Financial (c) Transaction (d) Business (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you, your business, your employer or your rental or contract hire provider. (b) Necessary for our legitimate interests</p>
<p>To manage our relationship with you, your business, your employer or your rental or contract hire provider.</p>	<p>(a) Identity (b) Contact (c) Transaction (d) Business (e) Profile (f) Marketing and Communications</p>	<p>(a) Performance of a contract with you, your business, your employer or your rental or contract hire provider. (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Business</p>	<p>(a) Performance of a contract with you, your business, your employer or your rental or contract hire provider. (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical (d) Business</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical (g) Business</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Business	Necessary for our legitimate interests (to develop our products/services and grow our business)
Crime Prevention	(a) CCTV images	Necessary for our legitimate interests (crime prevention)
Recording of telephone calls	This will depend on the nature of the call but will normally include: (a) Identity (b) Contact (c) Transaction (d) Business	Necessary for our legitimate interests (to train our staff)

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Applications for Credit

If you are applying for credit then to make credit decisions about you (including new applications for credit or requests to increase credit limits) we may use:

- information you give to us about your credit history;
- information about those you are financially linked to;
- information about how you have used other products and services offered by us or other members of Axle Group Holdings Limited;
- information we receive from third party credit reference agencies; and
- information we receive about you directly from other third parties.

For this purpose, we share information with credit reference and fraud prevention agencies. The information could then be used as follows:

- the credit reference or fraud prevention agency might add details of our search and your credit application to the records they hold about you, whether or not your application proceeds;
- we and the credit reference or fraud prevention agency might link your financial records to those of any person you are financially linked to – this means that each other's information (including information already held by us or the credit reference agency) will be taken into account in all future credit applications by either or both of you, until one of you successfully files a 'disassociation' at the credit reference agencies;
- we might add to the credit reference or fraud prevention agency's records details of how your agreements or accounts operate with us, including any default or failure to keep to the terms of your agreement, and any failure to advise us of a change of address where a payment is overdue;
- the credit reference or fraud prevention agency could pass on any of that information to other companies unrelated to us for the credit checking and fraud prevention purposes mentioned above; and
- the credit reference or fraud prevention agency will also use the information for statistical analysis about credit, insurance and fraud on an anonymous basis.

When credit reference agencies receive a search from us, they will place a search footprint on your credit file that may be seen by other lenders and other companies unrelated to us (for example, other banks and credit providers).

We may also use this information if required to fulfil any legal obligations to prevent financial crime including fraud and money laundering.

In order to process your application, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>.

Third-party marketing

We will not share your personal data with any company outside the AGHL group of companies for the purpose of their marketing activities.

Opting out

You can ask us to stop sending you marketing messages at any time by clicking here [INSERT LINK] or by following the opt-out links on any marketing message sent to you or by contacting us (INSERT LINK TO DPM DETAILS) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

For more information about the cookies we use, please see [LINK TO COOKIE POLICY.]

Change of purpose

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us (INSERT LINK TO DPM DETAILS).

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.

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.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us (INSERT LINK TO DPM DETAILS).

In some circumstances you can ask us to delete your data: see [*Request erasure*] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us (INSERT LINK TO DPM DETAILS).

No fee usually required

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 may 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 may 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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means 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 ([INSERT LINK TO DPM DETAILS](#)).

Performance of Contract means processing 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.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the AGHL Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in United Kingdom who provide IT and system administration services.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Marketing Service Providers acting as processors based in the United Kingdom who provide marketing, digital, creative, studio and print services and the collation of customer reviews.
- Credit reference and fraud prevention agencies which may also include the provision of trade references to other third parties.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Telephone Intelligence providers acting as processors in the United Kingdom who provide call recording services and intelligence on those calls.
- Electronic Trading Platform Providers.
- Tyre Manufacturers acting as processors if tyre examination is required.
- Third party payment processing providers that assist us in securely taking and managing payments.