

PRIVACY POLICY

LAST UPDATED 12TH JULY 2023

Peter Hilton Ltd (“Hilton Suzuki”) trading as Hilton Suzuki is committed to ensuring that when we collect and use information about people who visit our website or contact us in other ways (as described below), we do so in accordance with applicable data privacy laws. This Privacy Policy explains how we may use information that we obtain about you and how you can exercise your rights with respect to your personal information. Changes to the content or services found on our website may be changed without notice, and consequently our Privacy Policy may change at any time in the future. You should visit this page regularly to check for changes.

Under UK data protection laws, personal information may only be used where one of the following applies:

You have consented to the use

We use it to achieve a legitimate interest, and our reasons for using it outweigh any prejudice to your data protection rights

It is necessary to enter into or perform a contract with you

We need to use it to comply with our legal obligations

The use is necessary for us to protect your vital interests (or another person’s)

We need to use it to perform a task in the public interest

Generally, we will process data on one of the first two grounds listed above. If we are processing on the basis of consent, you will be presented with an opportunity to consent at the point where we collect your data. You may withdraw your consent at any time through the data preference centre (see further details below). If we are processing on the basis of our need to achieve a legitimate interest, the nature of that interest is set out below.

Our website is powered by G-Forces Web Management Limited (“GForces”), our third party web services provider. GForces is committed to ensuring that data is processed in accordance with applicable data privacy laws, and is kept secure. GForces is certified to the standard of ISO27001 (an international standard for information security). GForces uses Amazon Web Services, Inc. as its cloud platform provider. All data processed by GForces is stored on Amazon’s web servers in the EEA

WHAT INFORMATION DO WE COLLECT?

IF YOU VISIT OUR WEBSITE

When someone visits www.hiltonsuzuki.com we use a third party service, Google Analytics, to collect standard internet log information (your IP address, browser, and type of device) and details of visitor behaviour patterns (where you joined our site from, the path you take through our site and where you leave). We do this for the legitimate business purpose of monitoring the number of visitors to the various parts of the site and engagement levels, which in turn enables us to make improvements. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

Hilton Suzuki also uses cookies on its website. You can read more about how we use cookies in our Cookie Policy. This Privacy Policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

When someone visits our website, GForces collects standard internet log information (your IP address, browser, and type of device) and details of visitor behaviour patterns (where you joined our site from, the path you take through our site and where you leave). These are stored against unique ids (which are strings of numbers). GForces collects this information for the legitimate business purpose of monitoring the number of visitors to the various parts of the site, the general geographic location of visitors and engagement levels, which in turn enables it to make improvements to its websites and services, and provide business intelligence. This information is only processed in a way which does not identify anyone. It is kept indefinitely.

GForces also uses Google Analytics to collect standard internet log information and details of visitor behaviour patterns, which are stored against unique ids (i.e. strings of numbers). We collect this information for the legitimate business purpose of monitoring website traffic and engagement levels, which in turn enables us to make improvements to our website and the way we sell our cars and services. This information is only processed in a way which does not identify anyone. It is kept indefinitely.

IF YOU EMAIL US

Any email sent to us, including any attachments, may be monitored by us for cybersecurity reasons. Email blocking software may also be used. Hilton Suzuki has a legitimate business interest in using your email address, and any personal data included in your message, to resolve and respond to any issues raised. Your email will be handled in line with our policies, depending on the nature of your enquiry.

Emails sent to named individuals within Hilton Suzuki (e.g. mark@hiltonsuzuki.com) will be stored on our systems indefinitely for the legitimate business purpose of resolving your enquiry and then checking how enquiries have been dealt with, but will not be processed for any other purposes. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

IF YOU USE OUR ENQUIRY FORM

When you submit information using an online form, GForces processes the data collected and stores it for 31 days for the legitimate business purpose of enabling us to access the information and deal with your request (it is then kept for a further 14 days in GForces' routine back-ups for business continuity purposes). We collect the following information:

If you enter your post code, GForces stores the first part of it (e.g. 'ME14' or 'SW1') and links it to standard internet log information already collected (it is used for the same purposes as that information, as outlined above).

IF YOU MAKE A COMPLAINT TO US

When we receive a complaint from a person we make up a digital file containing the details of the complaint and store it on our system. The file normally contains the identity of the complainant (together with any contact details provided) and any other individuals involved in the complaint.

We will only use the personal information we collect for legitimate business purposes, i.e. processing the complaint and checking on the level of service we provide.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for three years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Under data privacy laws, you have the rights to:

- request access to your personal data;*
- request deletion or correction of your personal data; and*
- request that your personal data be transferred to another person.*

Our online data preference centre helps you to exercise the rights that data privacy laws give you and control your personal information. It contains five separate forms, as set out below.

- *See your data*

You can ask to see any personal information that we hold (known as a “subject access request”) by submitting the form on the “See your data” tab.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

- *Transfer your data*

By completing the form on the “transfer your data” tab, you can ask us to provide your data to a third party.

- *Delete your data*

You can ask us to delete the information we hold about you by completing the form on the “delete your data” tab.

- *Change your data*

If we do hold information about you, you can also ask us to correct any mistakes by completing the form on the “Change your data” tab.

- *Marketing Preferences*

On the “marketing preferences” tab, you can tell us how you would like us to send you marketing information, or ask us to stop marketing to you entirely.

Any data collected through the data preference centre is stored.

DO WE SHARE YOUR PERSONAL INFORMATION?

Other than as outlined above (for example where we use third party service providers), we will not usually disclose personal data. However we may disclose your information to third parties in the following circumstances:

- If we are under a legal or regulatory obligation to do so
- If we believe your use of our websites has or may violate any law, regulation or our Terms of Use
- If we believe you are or may be a threat to safety, security, property, our rights or the rights of others
- In a merger, acquisition, change of control, joint venture or other business combination involving Hilton Suzuki.

HOW CAN YOU MAKE A COMPLAINT ABOUT OUR USE OF DATA?

Hilton Suzuki tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

Any complaints should be addressed to the Data Protection Officer using the contact details below. If we fail to resolve your complaint to your satisfaction, you have the right to contact the UK Information Commissioner. For further information on how to do that, please go to the following webpage: <https://ico.org.uk/concerns>.

HOW CAN YOU CONTACT US?

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Hilton Suzuki collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

The Hilton Suzuki Data Protection Officer is Emma Withers. If you want to request information about our privacy policy, make requests concerning your data or make a complaint, you can email emma@hiltonsuzuki.com or write to:

FAO Data Protection Officer

London road, Spellbrook, Bishops Stortford, Hertfordshire, CM23 4AU...