

Privacy Policy

Green Car Depollution Limited (“we”, “our”, “us”) takes your privacy very seriously. Please read this Privacy Policy carefully to see how we will treat the personal information that you provide to us whether you are a visitor to our website www.greencardepollution.com, a visitor to our premises or one of our exhibitions or being visited by us for the purposes of sales or services. For data protection laws, the data controller(s) of any personal information collected by us.

This Privacy Policy provides information to you about the basis on which any personal data we collect from you. This Privacy Policy shall be read in conjunction with our terms and conditions. We will take reasonable care to keep your information secure and to prevent any unauthorised access or use of it. We process all information in accordance with applicable UK data protection legislation. We may change this Privacy Policy from time to time and the change will take effect once the revised Privacy Policy is available on our web site. Therefore, please refer to this Policy each time you submit your personal information. Any changes to our Privacy Policy will be posted to the website and, where appropriate, will be notified to you via email.

By using, registering or placing an order on the website, verbally or by email we may use and transfer your information under the terms of this Policy.

ARE YOU AGED 14 OR UNDER?

If you are aged 14 or under, please get your parent/guardian's permission beforehand whenever you provide personal information to us. Users without this consent are not allowed to provide us with personal information.

ARE YOU A SOLE TRADER / PARTNERSHIP OR AN INDIVIDUAL COMMUNICATING WITH US FROM A BUSINESS?

Where we collect and use your personal data from a corporate perspective (i.e. where we are contracting with you as a sole trader or partnership, or contracting with the business you are employed / contracted by) this will be done in accordance with the relevant parts of this Privacy Policy. If you have any questions or concerns about this, please contact us using either the details set out **below** or by speaking with your usual contact at Green Car Depollution Limited..

INFORMATION WE MAY COLLECT

The information you provide to us

We may ask you to provide information to us or collect information from you on different occasions, such as when you:

- email enquiries, contributions or your views to us;
- enter competitions;
- submit a job application, including completing the requisite diversity form;
- Receive or download information or documentation;
- subscribe to our newsletters or mailing list; or
- purchase goods or services from us.

In some instances the provision of information will be mandatory, for example if you purchase goods or services from us, otherwise you will be able to choose whether or not to disclose your personal information or not.

The information you give us may include your name, address, date of birth, gender, e-mail address, user name and password, phone number, financial and credit card information, demographic information such as postcode, preferences and interests, feedback and other information relevant to customer surveys or offers. We may also collect and process images, records of any correspondence and communications with us and telephone calls may also be recorded.

Information we receive from other sources.

Personal information may also be provided to us from online vendors, service providers who refer you to our website or services, from customer lists lawfully acquired from third party vendors and from other third parties who work with us in connection with our services. Third-party service providers may, without limitation, be appointed to provide technical support, process your transactions and maintain your accounts or to run promotions or marketing campaigns. We may have access to any personal information provided to such vendors, service providers and third-party e-commerce services.

HOW Green Car Depollution Ltd USES YOUR INFORMATION

We may use your personal information for the following purposes:

Information you give to us

We will use this information:

- to provide customer support e.g. responding to your enquiries;
- to send you a welcome email to verify your account when you register with us or make a purchase and other emails for the purposes of providing any services, products, competitions or promotions to you, including in relation to account management or system maintenance;
- to process job applications and diversity data;
- to send information to you that you have requested;
- to notify you about changes to our services and/or products;
- to carry out our obligations arising from any contract that we may enter into with you including to process and fulfil any order or request;
- for statistical and research purposes;
- to provide you with marketing information about other services or products we offer that are the same or similar to those that you have already purchased, or services or products you have consented to receiving. If you do not wish to receive this information please use the unsubscribe function in the information we send you, update your preferences through the preference centre or alternatively write to us at the address below this policy.
- for internal record keeping;
- to improve our products and services;

- to carry out appropriate and necessary investigations and identity checks and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements
- to ensure that content from our website and promotional material is presented in the most effective manner for you and for your computer or device (as applicable).

Please note we will not use any financial or credit card information for any purpose other than to discharge our legal / regulatory duties and to process payments paid by you for our products and services or due to you by agreement (e.g. refunds).

We, would like to send you marketing information, by post and by e-mail, Please see the "consent" section of **USING YOUR INFORMATION IN ACCORDANCE WITH DATA PROTECTION LAWS** below. If you change your mind about what marketing you would like to receive from us or third parties (including our commercial partners) at any time, you can unsubscribe via the link in any marketing communication, update your preferences through your account preference centre or alternatively you can write to us at the address below or email us at info@greencardepollution.com .

If you submit your views to us electronically or otherwise we may circulate them internally for training and management purposes. We may also publish your views on the website in other media. If you do not want us to do this, please let us know when you submit your views.

We may aggregate the information you send to us with other data (so that you cannot be identified from that data) and use that aggregated data for administrative purposes.

Information we collect about you.

We will use this information:

- to administer our Web site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to carry out appropriate and necessary investigations and identity checks and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements, and (where applicable) to safeguard our staff and other customers / users in respect of unlawful, disruptive or objectionable behaviour.
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer or device;
- To ensure you receive a continuously improving customer service
- to deliver (whether directly or indirectly via third parties) effective and personalised marketing material and content of Green Car Depollution Limited and where you have consented, other companies to assist us in the improvement and optimisation of advertising, marketing material and content, our services and website.
- to measure, understand or monitor the effectiveness of advertising, promotions, marketing material and content and any joint initiatives with our affiliates, suppliers, partners, subcontractors and other selected third parties;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you where permitted; and/or
- to make suggestions and recommendations to you and other users of our website or services about goods or services that may interest you or them.

Cookies are text files put on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity.

- For more information visit www.aboutcookies.org or www.allaboutcookies.org.
- You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some of our website features may not function because of this.

Analytics – e.g. how visitors use our website

- We may use Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.
- Google Analytics is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. These cookies do not store any personal information about you e.g. name, address etc and we do not share the data. You can view their privacy policy below:
- Google – <http://www.google.com/intl/en/policies/privacy/>

Information we receive from other sources.

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

USING YOUR INFORMATION IN ACCORDANCE WITH DATA PROTECTION LAWS

Data protection laws require that we meet certain conditions before we are allowed to use your data in the manner described in this Privacy Policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal data, we will rely on the following conditions, depending on the activities we are carrying out:

- **Compliance with legal obligations:** As an entity established under the laws of England and Wales, Green Car Depollution Limited is obliged to comply with UK laws and guidance provided by UK regulatory bodies. In particular, we will need to process your personal information to verify your identity, in some circumstances establish your age, establish your source of funds for anti-money laundering, anti-terrorism and fraud purposes.
- **Necessary for the entry into / performance of a contract:** When you enter into a transaction with us, a contract between you and us will have been entered into. In order for us to fulfil our obligations under such contract we will need to collect and process your personal information. Failure to provide the requisite personal information on sign-up and financial information on entering into the transaction or objecting to this type of processing / exercising your deletion rights will unfortunately mean we cannot provide our goods / services to you.

- **Consent:** We may send you electronic marketing messages about us, products and offers where you have not unsubscribed. We provide easy ways to stop our marketing, and you can opt out at any time.

If you are not a customer of ours but have provided us with consent to use your details for marketing purposes, then we may also contact you about our goods and services.

If you have confirmed that you would like to hear from us about other party's goods and services then we will use your details to contact you with marketing information about such party's goods and services.

If you have confirmed that you would like to hear directly from a third party about such party's goods and services then we will share your details with such third party so they can contact you about their goods and services.

In each of the situations above, you have the right to withdraw your consent at any time and can object to processing of this nature.

- **Legitimate interests:** To use your personal data for any other purpose described in this Privacy Policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively and to manage our business. Effectively, this requires us to carry out a balancing test of our interests in using your personal data (for example, in order to provide you with the information, products and services that you request from us), against the interests you have as a citizen and the rights you have under data protection laws (for example, to not have your data sold to third party marketing companies without your knowledge, or not store your personal data in insecure or unstable countries or regions). As a result of our balancing test, which is detailed below, we have determined, acting reasonably and considering the circumstances, that we are able to process your personal data in accordance with the data protection laws on the basis that we have a legitimate business interest.
 - We have a legitimate interest in processing your personal data as: (a) We need the information to respond to your enquiries (and where relevant process your CV/ job application); (b) We need the information to be able to send you information; and (c) We would be unable to provide our products and/or services without processing your information.
 - Necessity: We consider that it is reasonable for us to process your personal data for the purposes of our legitimate interests outlined above as we process your personal data only so far as is necessary for such purpose.
 - Impact: We consider that it is reasonable for us to process your personal data for the purposes of our legitimate interests outlined above as it can be reasonably expected for us to process your personal information in this way for the purposes set out above. In most cases the information is being processed for your benefit as well as ours.

HOW LONG WE KEEP YOUR INFORMATION FOR

When your data is no longer required for the purposes listed above, we will delete it within the periods set out below:

- We may keep your personal information beyond 7 years, in transactional platforms to maintain transactional record completeness to enable us to retain the information we may require for legal , regulatory and anti-fraud purposes.

- Where a subscriber (being an individual who has not purchased a product or service marketing consents will be refreshed after 24 months and data deleted after a further period of 12 months.
- Marketing emails and other communications where possible will typically be deleted after 5 years ;
- Call recordings will typically be deleted after 24 months;
- Unsuccessful job applications will typically be deleted after 12 months.

We may keep your personal information for up to 7 years, to enable us to retain the information we may require for legal and regulatory purposes.

We may keep your personal information for an amount of time which is different to that stated above, in certain circumstances. Where this is the case, you will be supplied with a supplemental policy or privacy statement, which will explain the relevant retention periods to you.

SHARING INFORMATION

We will only share your personal information with our affiliates and the third party service providers if this is necessary or reasonably required for any of the purposes listed above. Such third party service providers are not entitled to use your information for their own purposes.

We will only disclose your information to:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- third party suppliers and service providers to the extent they assist Green Car Depollution Ltd with its legal / regulatory obligations e.g. providers of services in respect of Health and safety, environmental Agency, anti-money laundering, fraud, verification etc.
- analytics and search engine providers that assist us in the improvement and optimisation of our website, and

We will disclose your personal information to third parties:

- in the event that we consider selling or buying any business or assets or merge or enter into a joint venture with another business entity in which case we will disclose your personal data to any prospective sellers or buyers of such business or assets;
- in the event of any insolvency situation (e.g. the administration or liquidation) of Green Car Depollution Limited;
- if we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- to protect the rights, property, or safety of us, our staff, our customers, or others. This includes exchanging information with other companies and organisations (including without limitation, other third parties, your employer, educational institution, email or internet provider, your parents (if you are under the age of 18) and/or the metropolitan police or other law enforcement agencies) for the purposes of staff and customer safety (whether this is in-store or online), crime prevention, fraud protection and credit risk reduction; and

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.

Please note that some of these third parties may be located outside of the United Kingdom, including in countries where data protection laws might not exist or be of a lower standard than the EU. Those parties may process information, fulfil and deliver orders, process credit card payments and provide services on our behalf. By submitting your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. If you wish to opt out of this, please email info@greencardepollution.com

- Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). **[Note: to be discussed – where is the personal data of customers stored?]** It may also be processed by staff operating outside the EEA who work for us, or one of our suppliers. This includes staff engaged in, among other things, the provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers, or those of our suppliers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

LINKS

The website may contain links to other sites. Please be aware that we are not responsible for the privacy practices of external sites. We encourage our users to be aware when you visit third party sites (including for the avoidance of doubt social media sites, such as Facebook, Twitter, Instagram and/or Snapchat and partner sites and to read the privacy statements applicable on those sites/apps. This Privacy Policy does not apply to information collected on third parties' sites/apps.

YOUR RIGHTS

You have a number of rights under data protection law in relation to the way we process your personal data, although these are not absolute and in some instances, we may be unable to accept your request, in which case we will respond to you to explain why. These are set out **below**. You may contact us using the details on our Site (or by contacting us directly – details **below**) to exercise any of these rights and we will respond to any request received from you within one month from the date of the request.

Data Protection can be contacted at info@greencardepollution.com. Please address any questions, comments and requests regarding our data processing practices to us in this way in the first instance.

NUMBER	DESCRIPTION OF RIGHT
Right 1	A right to access personal data held by us about you.
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
Right 4	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Right 5	In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. This right will only apply where the processing is based on consent or a contract (see above) and the processing is carried out by automated means. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right 6	A right to object to our processing of personal data held by us about you where the processing of such data is necessary for the purposes of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process personal data which override your rights or which are for the establishment, exercise or defence of legal claims.
Right 7	A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you. Whilst this right applies, to note – Green Car Depollution Limited does not carry out profiling or automated decision-making.

Right 8 A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).]

UPDATING YOUR INFORMATION

In the event that there is a change to your personal information, for example your contact details, please let us know of this in writing or by email at the addresses provided below so that we can keep your information up to date and accurate.

CONTACT US

If you have any comments or queries about this Privacy Policy, wish to stop direct marketing by Green Car Depollution Limited or you wish to exercise any of your rights set out above please write to Green Car Depollution Limited, Unit 4H Delta Drive Tewkesbury, Gloucestershire or email info@greencardepollution.com

This Policy was last reviewed and updated: May 2018