

April 2018

Introduction

This privacy policy aims to give you information on how Joe Duffy Group () collects and processes your personal data, including any data you may provide when you access this website or other websites controlled by a company within our group, when you enquire about a product or service, when you purchase a product or service from us, through your dealings with our staff, enter a competition, promotion or survey and when you report a problem with our website.

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 policy together with any other privacy policy 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 policy supplements the other notices and is not intended to override them..

Who we are and how to contact us

Throughout this document, “we”, “us”, “our” and “ours” refer the Joe Duffy Group.

“The Joe Duffy Group” means:

- JDM Automotive Limited incorporated in Ireland with limited liability having its registered office Exit 5 M50 North Road Dublin 11 and all members of its group.

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

Email address: dataprotection@joeduffy.ie

Postal address: JDM Automotive Limited, Data Protection Compliance Manager, Exit 5 M50, North Road, Dublin 11, Ireland

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, title, date of birth and gender.

Contact Data includes address, email address and telephone numbers.

JDM Automotive Limited - Privacy Policy

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.

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, occupation, vehicle details, gender and transaction history.

Vehicle Details: We may collect information about your vehicle, including your mileage, vehicle identity number service and warranty issues.

Transaction Data: includes data about your transactions with us such as the purchase of a vehicle.

Financial Information: Detailed financial information including contact details; income details; marital status; date of birth; gender; residential status; employment details; linked relationships; presence of a controlling interest in one or several companies in Ireland; partnerships in one or several companies in Ireland; previous customer or employee of a company that is a customer; bank details; payment method; and motor details

Interactions Data: information about your interactions with us, including correspondence and phonecalls between us and you.

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.

We may also anonymise data so that it is no longer personal data. For example we may anonymise the quote we provided for a used vehicle.

Our websites are 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.

When someone visits one of our websites, 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.

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).

Changes To The Privacy Policy And Your Duty To Inform Us Of Changes

Any changes we make to this privacy policy in the future will be posted to this website. Please check back frequently to see any updates or changes to this privacy policy.

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

Our 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 policies. When you leave any of website, we encourage you to read the privacy policy of every website you visit.

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.
- Where we rely on consent to process your personal data, you have the right to withdraw consent at any time. If you are making an enquiry either through our website, by phone or in our dealerships and you are not a customer, we will not use your personal data for marketing purposes without your consent.

We may use your personal information for the reasons set out below.

| Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|--|---|
| To process and provide you with a quotation for any service, including the purchase of a vehicle, the provision of finance or leasing of a vehicle, any insurance products, | (a) Identity (b) Contact Information (c) Financial | Necessary for performance of a contract with you |

JDM Automotive Limited - Privacy Policy

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| repair or service of a vehicle, test drive, product information | | |
| To register you as a new customer | (a) Identity (b) Contact Information | Performance of a contract with you |
| To provide you with a product or services, such as the sale of a vehicle, repair or service of a vehicle of the sale of parts | (a) Identity (b) Contact Information (c) Financial | Performance of a contract with you |
| To register your vehicle for VRT and VAT purposes | (a) Identity (b) Contact Information | To comply with a legal obligation |
| To manage our relationship with you which will include: Customer Satisfaction Surveys | (a) Identity (b) Contact Information (c) Vehicle Information | Necessary for our legitimate interests (to measure our customer satisfaction, keep our customer records up to date) |
| To monitor and train our staff and to deal with customer disputes | (a) Interaction | Necessary for our legitimate interests and to monitor and train our staff. |
| To Manage our everyday business needs, including accounting, sharing your information within our company group for administrative purposes, and to prevent fraud. Where we do so we rely on our legitimate interest in the effective management of our business | (a) identity (b) contact (c) financial | |
| To enable you to partake in a prize draw or competition | (a) Identity (b) Contact (d) Usage (e) Marketing and Communications | Performance of a contract with you |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we | (a) Identity (b) Contact | 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 |

JDM Automotive Limited - Privacy Policy

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| serve to you | (c) Profile Usage (e) Marketing and Communications (f) Technical | strategy) |
| 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 administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (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 |
| To provide you with marketing communications by post, text and email. | (a) Identity (b) Contact (c) Marketing | Where you are a potential customer will we only provide you with direct marketing where you have consented. You can withdraw this consent at any time. Where you are a customer will provide you with direct marketing where you have not opted out of the receipt of direct marketing. We rely on our legitimate interest. |
| Legal obligation | All personal data we collect | We may use your personal data to fulfil legal obligations to which we are such as complying with anti-money laundering obligations. |

All of our premises are monitored by CCTV cameras for security purposes. We have strict retention policies in respect of CCTV footage and process data captured by CCTV in for security purposes in our legitimate interest.

All of our external phone calls are recorded. We will use this information to monitor and train staff and to deal with customer disputes. Recordings of calls are subject to strict retention periods.

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 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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

You will receive marketing communications from us if you have purchased goods or services from us and you have not opted out of receiving that marketing.

Where you have not purchased goods or services from us, we will only send you marketing material where you have consented. You can withdraw this consent at any time.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us 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

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

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.

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.

Transfers outside the EEA

Some of our third party providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer outside of the EEA. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Disclosure of your Information

- **Third Party Service Providers:** We may share your personal information with third party service providers that perform services and functions on our behalf such as our accountants and other business advisors, IT service providers, printers, marketing companies who carry out marketing campaigns on our behalf, and providers of security and administration services.
- **Within our Company Group:** We are part of a larger company group, the Joe Duffy Group, and for administrative efficiencies your information may be stored within one central IT system.
- **New Owner:** We may also transfer your personal information to companies that buy our company or our business.
- **Finance companies, leasing companies, insurance companies and other third party providers:** Where you have asked for a quote to include the cost of financing, leasing or any other third party product, we may pass your personal information to that third party in order to obtain a quotation on your behalf.
- **Manufacturer of Your Vehicle & Their Distributor:** We may pass your personal information on to the manufacturer of the vehicle and/or their appointed distributor in Ireland for the purposes of warranty, service issues and recalls, ordering process and customer satisfaction surveys. The distributor and/or manufacturer may aggregate your personal data, such as information relating to gender to understand its customer base. The manufacturer may contact you separately regarding their use of your information

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.

Your Legal Rights

You have a number of rights under data protection law in relation to how we use your personal information. You have the right, free of charge, to:

1. check what type of personal data we hold about you and what we do with that information (you are also entitled to receive a copy of this information);
2. have any inaccurate personal data which we hold about you updated or corrected;
3. erase personal information we hold about you;
4. stop us from using your personal information in certain cases, including if you believe that the personal information we hold about you is inaccurate or our use of your information is unlawful. If you exercise this right, we will store your personal information and will not carry out any other processing until the issue is resolved;
5. object to us using your personal information where we rely on our legitimate interests to use your information. We will stop using your personal information unless we can demonstrate an overriding legitimate grounds for the continued processing of this information;
6. Withdrawing consent where you the processing. You can withdraw consent by contacting us at the details set out above; and
7. receive certain aspects of your personal information in a structured, commonly used and machine readable format and to have that information transferred to you or another data controller.

These rights are in some circumstances limited by data protection legislation. If you wish to exercise any of these rights please contact us using the contact details contained in this form. We will endeavour to respond to your request within one month. If we are unable to deal with your request within one month we may extend this period by a further two months and we will explain why.

You also have the right to lodge a complaint to the office of the Data Protection Commission. Please visit www.dataprotection.ie for more information.

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.