



## HOLT JCB LIMITED PRIVACY POLICY

Holt JCB is committed to protecting your personal information and complying with all applicable legislation in relation to data protection. This policy describes how we collect, use and disclose your personal information.

This policy applies to any personal information about you that you provide to Holt JCB or which is provided to Holt JCB by third parties.

The data controller in respect of personal information processed under this policy is Holt JCB Ltd (a company incorporated in England with company number 02199217 whose registered office is at Third Way, Avonmouth, Bristol, BS11 9ZG).

Holt JCB Limited's parent company is Holt JCB Holdings Limited, company number 07972511.

We have a nominated individual who is responsible for data protection who you can contact on 01179 827921 or via email at [DataProtection@Holtjcb.co.uk](mailto:DataProtection@Holtjcb.co.uk) should you have any comments or queries in relation to this policy or Holt JCB's use of your personal information.

### WHY DO WE COLLECT PERSONAL INFORMATION ABOUT YOU?

Holt JCB collects personal information about you to provide you with our products and services and to improve and develop these for the future.

### WHAT PERSONAL INFORMATION DO WE COLLECT?

Holt JCB collects the following types of personal information about you:

- Name
- Date of Birth
- Address and address history
- Contact details such as email address and telephone numbers
- Financial information and credit history
- Employment details
- Identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address
- Vehicle and/or machine registration and identification numbers
- Telematics information about the location of your vehicle and/or machine

### HOW DO WE RECEIVE PERSONAL INFORMATION ABOUT YOU?

Holt JCB receives personal information about you:

- When you contact us directly, visit our website ([www.holtjcb.co.uk](http://www.holtjcb.co.uk) or [www.usedjcb.co.uk](http://www.usedjcb.co.uk)) or use our social media channels, whether to apply for one of our products or services or to make an enquiry or other request.
- Holt JCB is an approved dealer of J C Bamford Excavators (JCB). If you approach JCB they will provide us with your personal data based upon the machine specification and your geographical location.
- From our carefully selected business partners who provide products and services directly associated to our business, such as third party owned websites that we advertise through and financial services providers who fund machinery purchases.

## HOW DO WE USE PERSONAL INFORMATION ABOUT YOU?

Holt JCB and its group may use your personal information for the following purposes:

- To verify your identity and to identify you when you contact us.
- As a precursor to entering into or fulfilling a contractual obligation.
- To make decisions on credit for the supply of goods & services to you.
- To help to prevent fraud and money laundering.
- To help administer, and contact you about improved administration of, any accounts, services and products we have provided before, or provide now or in the future.
- Recover debts that you owe and trace your whereabouts.
- To carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical information using data provided by you.
- To carry out statistical analysis to help with decisions about account management.
- To contact you for marketing purposes relating to products and services that we think will be of potential interest to you.
- To comply with legal obligations.

Any personal data provided to third parties for the purpose of financing a proposed purchase from ourselves will be processed in accordance with their Privacy Policy. Please refer to the Privacy Policy of the financial organisation for details on how your personal data is processed.

We retain the right, to access, view and interrogate JCB Livelink or any successor telematics system operating on JCB Products that have been supplied by us or other JCB Dealers. We may use this system to verify the location, mode of operation, service history or/any other information held on the system regarding operation and/or performance of such JCB Products.

## WHO DO WE PROVIDE THIS PERSONAL INFORMATION TO?

Holt JCB will provide your personal information to:

- The JCB group if you are acquiring or are interested in acquiring JCB Products.
- Affiliated manufacturers if you are acquiring or are interested in acquiring their products.
- Financial services providers, such as our preferred supplier of finance facilities JCB Finance Ltd, along with third parties who carry out associated services on their behalf.
- Fraud prevention agencies, trade bodies and credit reference agencies.
- Government agencies, including law enforcement agencies, government departments, courts, regulators and any party appointed by such agencies to carry out investigations or audits of our activities.
- Marketing providers.
- Third party debt collection agencies, insolvency practitioners and legal advisors.
- Independent financial auditors.
- JCB Finance Ltd who provide machinery quotation software to us.
- Our service providers who perform services on our behalf, such as banking services and data management firms.
- Third party companies directly involved in the fulfilment of Holt JCB's contractual obligations to you, including but not limited to transport companies, other JCB dealers, plant service and document distribution companies.

## WHAT WILL HOLT JCB DO WHEN YOU APPLY FOR OUR PRODUCTS OR SERVICES?

### FRAUD PREVENTION & MONEY LAUNDERING

Before we provide products or services to you Holt JCB may undertake checks for the purposes of preventing fraud and money laundering and to verify your identity.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

### WHERE WE STORE YOUR INFORMATION

All personal information we have about you is stored on secure servers operated by Holt JCB or its third party service providers.

### HOW LONG WILL WE KEEP PERSONAL INFORMATION ABOUT YOU?

Holt JCB will keep a copy of your personal information for as long as we have a contractual relationship with you, or from the point of a machine or product purchase, and for a period of 7 years thereafter. For personal information which is not linked to a machine or parts and service purchase we will keep this for a period of 7 years from the date of the record. All SalesMaster quotes will be kept for 48 months from the point of quote.

We may keep your data for longer periods if we cannot delete it for legal, regulatory or technical reasons. Maintaining your personal information for these periods allows us to keep accurate records for our legal obligations and to handle any future complaints.

### DATA TRANSFERS

Holt JCB does not transfer your data outside the European Economic Area (EEA). Whenever fraud prevention agencies transfer your personal data outside of the EEA, they impose contractual obligations on the recipients of that information to protect it to the standard required in the EEA.

### COOKIES

For detailed information on the cookies we use and the purposes for which we use them see the Holt JCB Cookie Policy on our website.

### YOUR RIGHTS

You have the following rights in connection with your personal information processed Holt JCB:

- **ACCESS** – you can request access to your personal information (and a copy, in a structured, commonly used and machine readable format) and further details about how your personal information is handled by Holt JCB
- **OBJECT** – you have the right to object to our processing of your personal information for direct marketing purposes.
- **RECTIFICATION** – you can request rectification of any incorrect personal data held about you.

- **ERASURE** – you can request erasure of any personal data where the processing is based on explicit consent.

You have a right at any time to opt-out or withdraw consent of receiving marketing from us and/or to amend the delivery method we use. We will only use your personal information to send you marketing messages where we have your consent to market to you. In some cases we may market to you by electronic means (e.g. by email or text) where we have provided you with goods and services and would like to give you information about similar goods and services on the basis that we have a legitimate interest to market such goods and services to you where we think you would be interested in hearing about them. We will not do this if you have asked not to be contacted, e.g. where you have not consented or otherwise have opted out of marketing.

To manage your rights and delivery preferences please follow the instructions in our marketing communications, enquiry forms or write to us at:

Post: Marketing Department, Holt JCB Limited, Third Way, Avonmouth, Bristol, BS11 9ZG Email: [marketing@holtjcb.co.uk](mailto:marketing@holtjcb.co.uk)

You can also opt-out from us passing your information to the other businesses listed above.

You can exercise any of these rights at any time by contacting our nominated individual who is responsible for data protection using the contact details provided above.

If you are concerned or have questions about how Holt JCB handles your personal data please contact us and we will do our best to assist you. Please note that you have the right to lodge a complaint with the UK Information Commissioner's Office (or any other appropriate supervisory authority), which may be accessed through the following link <https://ico.org.uk/concerns/>.

#### **CHANGES TO OUR PRIVACY POLICY**

Holt JCB reserve the right to revise this privacy policy or any part of it from time to time. Please check back frequently to see any updates or changes to our privacy policy.