



Combined Ford / Dealer Fair Collection Notice

When you buy a product or receive services from:

- **Hartwell Automotive Group Ltd ("Hartwell")**
- Ford Motor Company Limited registered in England: No. 235446, registered office: Eagle Way, Brentwood, Essex CM13 3BW ("Ford", "we", "our" or "us")

Certain information about you and your vehicle ("**personal information**") will be collected.

This notice explains how your personal information will be used and who it will be shared with.

In addition to this notice, some Ford products and services (including some Ford apps) have their own privacy policies which describe in more detail how your personal information is used in a particular context. You can also find out more about what information your vehicle collects and uses by consulting the owners' manual or its accompanying app (where available).

Who your personal information will be shared with

Your personal information may be disclosed to:

- companies or other organisations that Ford and/or "Hartwell" have engaged to provide services on their behalf such as web-hosting companies, mailing vendors, analytics providers, event hosting services, and information technology providers;
- companies or other organisations where you have asked us or "Hartwell" to or agreed that we may share your personal information with them;
- other Ford dealers and our partners where this is necessary to provide you with a product or service;
- professional advisors;
- any law enforcement agency, court, regulator, government authority or other third party where Ford and/or "Hartwell" believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our or "Hartwell" rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues; or
- any third party that purchases, or to which we or "Hartwell" transfer, all or substantially all of our respective assets and business. Should such a sale or transfer occur, we or "Hartwell" as appropriate, will use reasonable efforts to try to ensure that the entity to which your personal information is transferred uses it in a manner that is consistent with this notice.

Ford may also share your personal information with FCE Bank plc ("**Ford Credit**"), Ford Motor Company, other Ford Motor Company Group companies worldwide. When we share your personal information, we will make sure that is used for purposes which are compatible with those described in this notice. A list of the companies within Ford Motor Company Group is available at www.ford.co.uk.

Transferring your personal information internationally

Your personal information will be treated in accordance with UK law concerning data protection and may be transferred within the European Economic Area ("**EEA**"), as well as to countries outside the EEA (including to the USA). The countries to which we transfer your personal information may not be regarded by the European Commission as ensuring an adequate level of protection for personal information. As a result, when we transfer your personal information outside the EEA we will put in place appropriate safeguards in accordance with our legal obligations to ensure that your personal information is adequately protected irrespective of the country to which it is transferred. These safeguards may

include obtaining contractual assurances from any third party given access to your personal information that your personal information will be protected by standards which are equivalent to those that protect your personal information when it is in the EEA. If you would like to know more about how Ford protects your personal information when it is transferred outside the EEA, or to obtain a copy of the safeguards we put in place to protect your personal information when it is transferred, please contact us at the address below.

What personal information will be used

Ford and “Hartwell” collect your personal information when:

- you fill in forms or make bookings (for example, if you book a service or request a test drive);
- receive services or purchase products at “Hartwell” and
- you contact us (for example, we will keep a record of the information you provide when you write to us or contact our customer service centres).

When you bring your vehicle in for servicing or repair, we will collect diagnostic information about your vehicle and keep a record of the work carried out and parts supplied. We explain more about this in a separate section at the end of this notice.

The personal information we and “Hartwell” collect includes:

- your name and contact information (such as your address, telephone number(s) and email address) and information about your business or employer if you are enquiring in a commercial capacity;
- information about your vehicle (including your Vehicle Identification Number (“VIN”), vehicle registration number, model, age and mileage);
- the products and services in which you are interested or have purchased;
- your contact and marketing preferences; and
- information required for financing purposes such as payment information.

In addition, where permitted by law, we may combine the information we hold with information about you or your interests, socio-economic and socio-demographic status, online identifiers and current contact details collected by third parties such as marketing agencies and from public sources.

We may be required by law to collect certain personal information. We may also be required to collect your personal information as a result of a contractual relationship with you. Failure to provide this information may prevent or delay the fulfilment of these obligations.

How your information will be used

We and “Hartwell” use the personal information we collect to:

- fulfil your requests (for example, to provide services to you);
- manage and improve our business and our relationship with you;
- assess the quality of the services we and “Hartwell” provide, and the services our suppliers provide to us or on our behalf;
- deal with your enquiries;
- conduct research;
- send you marketing material in line with your communications preferences; and
- comply with our legal and regulatory responsibilities, to respond to legal process or requests for information issued by government authorities or other third parties, and to prevent and detect crime and fraud, or protect your, our or others’ rights.

For more information about how the personal information we collect when your vehicle is serviced or repaired is used, please see the ‘**Repair, diagnosis and servicing for your Ford vehicle**’ section of this notice below.

We, Ford Motor Company, other Ford Motor Company Group companies worldwide and “Hartwell” may combine and, using automated decision-making processes, analyse your personal information to assist with the purposes outlined above, and to:

- help us understand, develop and improve our products, processes, and services and marketing strategies;
- personalise our communications, products and services to you;
- keep your personal information up to date;
- to understand our customers better; and
- to manage and improve our relationship with you.

This could include, for example, informing our distribution strategy, evaluating the effectiveness of our marketing and customer service, conducting market analysis and identifying products or services which may be of interest to you, and contacting you to tell you about such products and services.

In some limited circumstances, the automated decisions we take may have a legal or similar effect on you. We will only make these kinds of automated decisions about you where:

- The decisions are necessary for performing or entering into a contract with you;
- The decisions are authorised by law; or
- You give your consent to us carrying out automated decision-making.

You can contact us to request further information about automated decision-making, and in some circumstances object to the use of automated decision-making, or request that an automated decision is reviewed by a human.

We would like to make sure the communications we send you and our interactions with you are as relevant to you as possible. As a result, from time to time, we may use information about you collected from public sources and third parties (as described in the '**What personal information will be used**' section above) to help us determine what Ford products and services you might be interested in. For example, analytics providers and advertising services may analyse the information they collect from online and other sources to provide us with information about your demographics and interests – such as inferences about your age range and the types of products or services that may interest you. We may then send you information about those products and services in accordance with your communications preferences, and use the information we hold about you to inform our customer service centres if you contact them. We may also work with third parties to show you tailored advertising on social media platforms or, if you have consented to the use of cookies, when you browse the internet/visit other websites. You can find out how to stop receiving marketing material from us in the '**Your rights**' section below.

We and “Hartwell” keep your personal information in identifiable form for as long as is reasonably necessary to fulfil the purposes for which it is collected and as required to comply with applicable legal and regulatory obligations. This generally means holding your personal information for as long as one of the following apply:

- your personal information is reasonably required in order to provide the services you have requested to you;
- your personal information is reasonably required in order to protect and defend our and/or “Hartwell” rights or property (this will generally be the length of the relevant legal limitation period); or
- applicable laws or regulations otherwise require the retention of your personal information.

The lawful grounds that will be relied upon when your personal information is used

There are different lawful grounds that we and “Hartwell” rely on to use your personal information and we and “Hartwell” will collect and use your personal information in the following situations:

- where our and/or “Hartwell” use of your personal information is **necessary to perform a contract or contracts that you are a party to, or to take steps that you request before entering into a contract**. These contracts could include the conditions on which you enter a competition or agreements you enter into for service products;
- where our and/or “Hartwell” use of your personal information is **within our legitimate interests or the legitimate interests of the organisation with which we have shared your personal information** and we have made sure that your personal information, and your rights in relation to that information, are protected. For example, we may rely on this legal ground if we and/or the companies within the Ford Motor Company group use your personal information to: understand and improve our (or their) products, services and/or business and marketing

strategies; for research purposes; to manage and improve our relationship with you and for administrative purposes; to help find out what information, products and services are most likely to interest you and to send or show you information, offers, and online advertisements for these products or services; to personalise your experience of our products and services; to ensure that our products and services are delivered and used in accordance with the law and the terms and conditions that apply to them; and where necessary to protect or defend our or another's rights or property, or to detect, prevent, or otherwise address fraud, security, safety or privacy issues. "Hartwell" may rely on this legal ground if it uses your personal information to: understand and improve its products, services and/or marketing strategies; for research purposes; to manage and improve its relationship with you and for administrative purposes; to help find out what information, products and services are most likely to interest you and to send or show you information, offers, and online advertisements for these products or services; to personalise your experience of its products and services; to ensure that its products and services are delivered and used in accordance with the law and the terms and conditions that apply to them; and where necessary to protect or defend its or another's rights or property, or to detect, prevent, or otherwise address fraud, security, safety or privacy issues;

- where we and/or "Hartwell" believe it is necessary to use your personal information to **comply with a legal or regulatory obligation**;
- in limited circumstances where we and/or "Hartwell" believe it is necessary to protect someone's safety or **vital interests**;
- in certain circumstance we and/or "Hartwell" may need to use your personal information for purposes which are in the **public interest**; and
- where we and/or "Hartwell" have your **consent**. We will rely on your consent to, for example, use your personal information for marketing to you by email and text message in accordance with your marketing preferences. Where we rely on consent to use your personal information, you have the right to withdraw that consent at any time. Please see the **'Your rights'** section of this notice for more details.

Your rights

You have the right as an individual to find out what information Ford and/or "Hartwell" holds about you and for what purposes, as well as to access that information and make corrections if necessary. You also have the right in some circumstances to object to our use of your personal information, to ask us to restrict or erase your personal information or to request that your personal information is provided to you in a commonly used electronic format so that you can share it with other organisations (this is often referred to as the right to 'data portability').

Where you have consented to the use of your personal information (please see the section named **'The lawful grounds that will be relied upon when your personal information is used'** for further information), you have the right to withdraw your consent at any time.

If you have questions or concerns regarding "Hartwell's" use of your personal information, or would like to access the information that Hartwell holds about you or exercise any of the other rights you have in relation to the personal information that "Hartwell" holds about you, please contact DPO@hartwell.co.uk

If you have questions or concerns regarding Ford's use of your personal information, or would like to access the information that Ford holds about you or exercise any of the other rights you have in relation to the personal information that Ford holds about you, please contact:

By post to:
Privacy Enquiry
PO Box 2318
GLASGOW
G33 9DD

By email to: dpeurope@ford.com

Ford and Ford Credit have appointed a Data Protection Officer. You can contact the Data Protection Officer at dpeurope@ford.com.

"Hartwell" have an appointed Data Protection Officer. You can contact the Data Protection Officer at DPO@hartwell.co.uk

We encourage you to contact us and “Hartwell” to update or correct your personal information if it changes or if the personal information we hold about you is inaccurate.

If you have a complaint about the way in which Ford or “Hartwell” uses your personal information we hope that in the first instance you will contact us or “Hartwell”. You may, however, also make a complaint to the Information Commissioner’s Office, which is the authority that upholds information rights in the UK.

Changes to this notice

We may modify or update this notice from time to time. If we and/or “Hartwell” change this notice, we will notify you of the changes. Where changes will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights in relation to your personal information (for example, to object to the processing).

Your marketing preferences

Ford and “Hartwell” would like to keep you up to date with information and offers from Ford and “Hartwell”.

Please let us know if and how you would like to hear from us by ticking the boxes below.

I do not want to receive information and offers from” Hartwell” via the following channels:	
Email	<input type="checkbox"/>
SMS	<input type="checkbox"/>
Postal mail	<input type="checkbox"/>
Telephone	<input type="checkbox"/>
I would like to receive information and offers from Ford by:	
Email	Yes <input type="checkbox"/>
SMS	Yes <input type="checkbox"/>
Postal mail	Yes <input type="checkbox"/>
Telephone	Yes <input type="checkbox"/>

Repair, diagnosis and servicing for your Ford vehicle

When your Ford vehicle was manufactured it was assigned a unique number (the Vehicle Identification Number, or VIN). From the VIN we can tell certain information about your vehicle, including its model, age, the software it uses, its technical specifications.

In order to diagnose, analyse, repair or service your vehicle, the technicians working on it will need to collect the VIN together with certain diagnostic information and information about the current state of your vehicle (for example, what software versions it is using, its mileage etc.).

This information will be transferred to a system run by Ford so that the technicians working on your vehicle can be provided with vehicle-specific repair, maintenance and diagnostic information (such as

wiring diagrams and vehicle software updates) and information about any past work carried out on your vehicle to assist them to diagnose, repair and/or service it and to enable them to maintain their records.

To make sure your vehicle has a comprehensive diagnosis record, information about what work is done to your vehicle when it is serviced or repaired will be linked to the VIN of your vehicle. This will be transferred to the system and stored so that Ford (or any third parties it authorises to use the system in this way) can make information about past repair or service available to any dealer or repairer anywhere in the world who needs to repair or service your vehicle.

The information held on the system is also used by Ford to enable the diagnosis, repair of your vehicle, to manage and administer warranties and similar products and services, for product safety and research and development purposes and to enable Ford to comply with its legal obligations.

In addition to the transfers of information described above, Ford may also pass this information to:

- companies in the Ford corporate Group for the purposes of research and development and analytics; and/or
- to companies in the Ford corporate Group and/or third parties where Ford believes this is necessary to comply with a legal or regulatory obligation, or otherwise to protect the rights of Ford, other companies in the Ford Motor Company corporate group, or the rights of any third party.

You can find out more about the legal grounds we rely on when we use your personal information in the section named '**The lawful grounds that will be relied upon when your personal information is used**' above.

Given the global nature of the system, VIN information is transferred to countries outside the European Economic Area by Ford. You can find out more about the international transfers of personal information in the section named '**Transferring your personal information internationally**' above.

As this information is a formal record of your vehicle, we retain it for 20 years.

If you have any questions, or would like to access the information about your VIN held in the system or exercise any of the other rights you have in relation to your personal information (you can find out more about these above), please contact Ford at:

Privacy Enquiry
PO Box 2318
GLASGOW
G33 9DD

Or at dpeurope@ford.com