

Privacy and cookies policy

1.

1. Introduction

2. We are committed to safeguarding the privacy of our website users and our customers and customer personnel; in this policy we explain how we will handle your personal data.
3. This policy applies to all J & A Motors Ltd websites and services, including <https://www.jandamotors.co.uk>

2.

1. How we use your personal data

2. In this Section 2 we have set out:
 1. the general categories of personal data that we may process;
 2. in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 3. the purposes for which we may process personal data; and
 4. the legal bases of the processing.
3. We may process data about your use of our websites and services ("*usage data*"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the websites and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our websites and services.
4. We may process your personal data incorporated that you provide to us in the course of the use of our services ("*service data*"). The service data may be processed for the purposes of providing our services, ensuring the security of our websites and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our websites and business.
5. We may process information that you post for publication on our websites or through our services ("*publication data*"). The publication data may be processed for the purposes of enabling such publication and administering our websites and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our websites and business.
6. We may process information relating to transactions, including purchases of services, that you enter into with us and/or through our websites ("*transaction data*"). The transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our websites and business.

7. We may process information that you provide to us for the purpose of subscribing to our newsletters and other notifications ("*newsletter data*"). The newsletter data may be processed for the purposes of sending you the newsletters and other notifications, and analysing their use. The legal basis for this processing is consent.
8. We may process information contained in or relating to any communication that you send to us by email or any similar communications system ("*message data*"). The message data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The message data may be processed for the purposes of communicating with you (including where appropriate sending you sales or marketing materials) and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our websites and business and communications with users, prospective customers and customers.
9. We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
10. In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.

1. Providing your personal data to others

2. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
3. In addition to the specific disclosures of personal data set out in this Section 3, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4.

1. International transfers of your personal data

2. In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
3. You acknowledge that personal data that you submit for publication through our websites or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

5.

1. Retaining and deleting personal data

2. This Section 5 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
3. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
4. We will retain your personal data for the following periods, at the end of which periods it will be deleted or anonymised:
 1. usage data will be retained for a period of 30 months following the date of collection;
 2. account data and service data will be retained for so long as the associated account remains open and for a period of up to 7 years following the end of the year during which the corresponding account was closed;
 3. publication data will be retained for the period of publication and for a period of up to following 12 months following the date it ceases to be published;
 4. transaction data will be retained for a period of up to 7 years following the end of the year during which the relevant transaction occurred;
 5. newsletter data will be retained for for so long as the relevant person remains opted-in to notifications; and
 6. message data will be retained for a period of up to 7 years following the end of the year during which the relevant communication was sent.
5. Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6.

1. Amendments

2. We may update this policy from time to time by publishing a new version on our website.
3. We may notify you of significant changes to this policy by email.

7.

1. Your rights

2. In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
3. Your principal rights under data protection law are:
 1. the right to access;
 2. the right to rectification;
 3. the right to erasure;
 4. the right to restrict processing;
 5. the right to object to processing;

6. the right to data portability;
 7. the right to complain to a supervisory authority; and
 8. the right to withdraw consent.
4. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
 5. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
 6. In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
 7. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
 8. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
 9. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you

make such an objection, we will cease to process your personal data for this purpose.

10. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
11. To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
12. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
13. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
14. You may exercise any of your rights in relation to your personal data by written notice to us.

8.

1. Third party websites

2. Our websites includes hyperlinks to, and details of, third party websites.
3. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

9.

1. Updating information

2. Please let us know if the personal information that we hold about you needs to be corrected or updated.

10.

1. Acting as a data processor

2. In respect of personal data which falls within the scope of any data processing contract that we have entered into, we do not act as a controller of that personal data; instead, we act as a processor of that personal data.
3. Insofar as we act as a processor rather than a controller, this policy shall not apply. Our legal obligations as a processor are instead set out in the contract between us and the relevant controller.

11.

1. About cookies

2. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
3. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set

expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

4. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

12.

1. Cookies that we use

2. We use cookies for the following purposes:
 1. authentication and navigation - we use cookies to identify you when you visit our websites and as you navigate our websites;
 2. shopping cart - we use cookies to maintain the state of shopping carts as you navigate our websites;
 3. personalisation - we use cookies to store information about your preferences and to personalise our websites for you;
 4. security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our websites and services generally; and
 5. analysis - we use cookies to help us to analyse the use and performance of our websites and services.

13.

1. Cookies used by our service providers

2. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our websites is used to create reports about the use of our website. Google's privacy policy is available at:
<https://www.google.com/policies/privacy/>.

14.

1. Managing cookies

2. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
 1. <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
 2. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
 3. <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
 4. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
 5. <https://support.apple.com/kb/PH21411> (Safari); and
 6. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
3. Blocking all cookies will have a negative impact upon the usability of many websites.
4. If you block cookies, you will not be able to use all the features on our websites.

15.

1. Our details

2. Our legal name is J & A Motors Ltd.
3. We are registered in England and Wales under registration number 4112081, and our office is at 60 Greenford Road, Greenford, UB6 9AT, United Kingdom.
4. You can contact us:
 1. by post, using the address given above;
 2. using our website contact forms;
 3. by telephone, on any contact number published on our websites from time to time; or
 4. by email, using any email address published on our websites from time to time.