

TOP GUNZ PRIVACY NOTICE
VERSION 1.1

In this Privacy Notice: Data Protection Legislation means

(i) before 25 May 2018, the EU Data Protection Directive 95/46 and all national implementing laws (including the UK Data Protection Act 1998); and
(ii) on or after 25 May 2018, the EU General Data Protection Regulation 2016/679 ("GDPR"); together with all other applicable and national implementing legislation relating to privacy or data protection; and where we use the terms "personal data", "data subject", "controller", "processor" and "process" (and its derivatives), such terms shall have the meanings given to them in the Data Protection Legislation.

INTRODUCTION

TOP GUNZ is committed to keeping your personal data private. We shall process any personal data we collect from you in accordance with Data Protection Legislation and the provisions of this Privacy Notice. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

DATA CONTROLLER

For the purpose of GDPR, TOP GUNZ is the data controller of your information. This means that we are responsible for deciding how we hold and use your personal data. We are required under Data Protection Legislation to notify you of the information contained in this Privacy Notice.

DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal data, please contact the DPO at the contact details set out below.

COLLECTING INFORMATION FROM YOU

TOP GUNZ will collect and process your personal data you provide us through estimate repair forms, our website, face-to-face and electronic communication (including telephone conversations) in order to provide our services to you.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

We may collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, address, telephone number, and personal email address.
- Date of birth
- Gender
- Vehicle make, model and registration number
- Insurance details including insurer name, policy number, date of incident and claim reference number
- IP address
- Employment status and salary
- Marital status and dependants

- Financial information
- Pay records
- Location of employment or workplace
- Copies of driving licences or other IDs such as passports
- Other information about an individual that you or they disclose to us when communicating with us
- Other information obtained through electronic means
- Photographs Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described below is applicable.

LAWFUL GROUNDS FOR USING YOUR INFORMATION

We are permitted to process your personal data in compliance with Data Protection Legislation by relying on one or more of the following lawful grounds:

- You have explicitly agreed to us processing such information for a specific reason.
- The processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you.
- The processing is necessary for compliance with a legal obligation we have.
- The processing is necessary for the purposes of a legitimate interest pursued by us, which might be:

- To provide services to you
- To ensure that our Client accounts are well-managed
- To protect our business interests
- To ensure that complaints are investigated
- To evaluate, develop or improve our services
- To keep our Clients informed about relevant services, unless you have indicated at any time that you do not wish us to do so.

PURPOSES OF PROCESSING

Specifically, we may use your information for the following purposes and under the following legal bases:

- To provide and manage your account(s) and our relationship with you
 - Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
 - Where the law requires this
 - Where it's in our legitimate interests to ensure that our Client accounts are well-managed, so that our Clients are provided with a high standard of service, to protect our business interests and the interests of our Clients
- To give you statements and other information about your account or our relationship
 - Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
 - Where the law requires this
- To handle enquiries and complaints

- Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
 - Where the law requires this
 - Where it's in our legitimate interests to ensure that complaints are investigated, for example, so that our Clients receive a high standard of service and so that we can prevent complaints from occurring in future
 - In the case of sensitive information, such as medical information, where you have agreed
- To provide our services to you
 - Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
 - Where the law requires this
- For assessment, statistical, market and product analysis and market research.
 - Where the law requires this
 - Where it's in our legitimate interests to develop, build, implement and run business models and systems which protect our business interests and provide our Clients with a high standard of service
- To evaluate, develop and improve our services to you and other Clients
 - Where it's in our legitimate interests continually to evaluate, develop or improve our products as well so that our Clients are provided with a high standard of service
- To protect our business interests and to develop our business strategies
 - Where it's in our legitimate interests to protect our people, business and property and to develop our strategies
 - Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
 - Where the law requires this
 - In the case of sensitive information, such as medical information, where you have agreed
- To contact you, by post, phone, text, email and other digital methods. This may be:
 - Where the law requires this
 - Where we have agreed to contact you in our agreement
 - to help you manage your accounts
 - to meet our regulatory obligations
 - to keep you informed about products and services you hold with us and to send you information about products which may be of interest to you.
 - Where you agree
 - Where it's in our legitimate interests to share information with our Clients about products / services that may be relevant and beneficial to them. Where we send you marketing messages, you can always tell us when you no longer wish to receive them. Please see more information in the Contact Us section

- To collect any debts owing to us
 - Where it's in our legitimate interests to collect any debts owing to us
 - In the case of sensitive information, such as medical information, where you have agreed
- To meet our regulatory compliance and reporting obligations and to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes.
 - Where the law requires this
 - Where it's in our legitimate interests to prevent and investigate fraud, money laundering and other crimes
 - Where such processing is a contractual requirement of the services you have requested
- To monitor, record and analyse any communications between you and us, including phone calls
 - Where it's in our legitimate interests, to check your instructions to us, to analyse, assess and improve our services to Clients, and for training, For the enhancement of our Client service provision and protection of our business interests
 - In the case of sensitive information, such as medical information, where you have agreed
- To transfer your information to or share it with any third party to whom your account has been or may be transferred following a restructure, sale or acquisition.
 - Where necessary for the performance of our agreement with you
 - Where we have a legitimate interest in restructuring or selling part of our business
- To share your information with UK or other relevant tax authorities, the DVLA, VOSA, Insurance companies and any overseas regulators and authorities
 - Where the law requires this
 - Where we have a legitimate interest in performing checks so that we can make responsible business decisions. As a responsible organisation, we need to ensure that we only provide certain products to companies and individuals where the products are appropriate, and that we continue to manage the services we provide, for example if we consider that you may have difficulties making a payment to us.
 - Where we have a legitimate interest in assisting with the prevention and detection of fraud and other crime
 - Where we have a legitimate interest in assisting UK and overseas regulators, who monitor banks to ensure that they comply the law and regulations
 - More detail on our data sharing with these organisations is set out below
- To share your information with our partners and service providers
 - Where necessary for the performance of our agreement
 - Where we have a legitimate interest in using third parties to provide some services for us or on our behalf

INFORMATION SHARING

We keep all your personal data confidential. However, in order to be able to service your needs to the best of our ability, we may share any information you provide to us with counterparties and support service or data providers, wherever located. We will ensure that if we share such

information with third parties, any such disclosure is at all times in compliance with Data Protection Legislation.

The recipients or categories of recipients, of your information may be:

- Any revenue service or tax authority including to HMRC, if obliged to do so under applicable regulations. For Common Reporting Standards and FATCA, we may also have to report you to the necessary tax authorities.
- UK and overseas regulators and authorities in connection with their duties (such as crime prevention).
- Anyone to whom we may transfer our rights and/or obligations;
- Any other person or organisation after a restructure, sale or acquisition, as long as that person/organisation uses your information for the same purposes as it was originally given to us or used by us (or both). This will be the responsibility of the person/organisation.
- Recovering debt including, but not limited to, services such as Money Claim On-line (MCOL)
- Vehicle related organisations such as DVLA, VOSA and/or the local Police force if obliged to under applicable regulations.

RETENTION AND DISPOSAL OF DATA AND OUTPUT

We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required. We will normally destroy or erase data after statutory timelines lapse. However, we may retain your information, or information relating to your account after you cease to be a Client for longer than this, provided it is necessary for a legal, regulatory, fraud prevention or other legitimate business purpose.

STORAGE OF YOUR PERSONAL DATA AND DATA SECURITY

The majority of information you provide to us is stored as a hard copy (paper) and secure within a locked office and within secure servers behind a firewall in respect to digital information. 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 the DPO, company Director and other third parties who have a business need to know basis. 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

OUR COMMUNICATION WITH YOU

We may communicate with you via electronic mail (e-mail). We may record your calls for training, quality and security purposes. We may communicate with you via text message. We may communicate with you via written methods.

MARKETING INFORMATION

We may use your information from time to time to inform you by letter, telephone, text (or similar) messages, email or other electronic means, about services which may be of interest to you. You

may, at any time, request that we cease or do not send such information by one, some or all channels, by contacting us using the contact details set out below.

RIGHTS OVER YOUR PERSONAL DATA

Under certain circumstances, by law you have the right to:

- Be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences).
- Object to your personal data being processed for a particular purpose or to request that we stop using your information.
- Ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible and otherwise required by applicable regulations.
- Withdraw, at any time, any consent that you have previously given to us for our use of your personal data.
- Ask us to stop or start sending you marketing messages at any time.
- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. 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 working relationship with us.
- Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where you think that we do not have the right to process it. Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will provide this information free of charge unless the request is manifestly unfounded or excessive. We will comply with our legal obligations in regards to any individual's rights as a data subject. If you would like to contact us in relation to any of the rights set out above please do so using the following contact details:

- To protect your privacy and security, we may take reasonable steps to verify your identity before providing you with the details.

RIGHT TO COMPLAIN TO THE ICO

You can contact the ICO if you have any concerns about how TOP GUNZ has handled your personal data and you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact the ICO via their helpline on 0303 123 1113.

You can find out more information about your rights as a data subjects, their regulatory powers and actions they can take on their website <https://ico.org.uk>

THIS PRIVACY NOTICE

The content or services mentioned on our website may be changed in future and consequently this Privacy Notice may also change. Any changes we may make to this Privacy Notice in the future will be posted on this page and where appropriate, notified to you by email. We recommend that you re-visit this page regularly and inform us if you do not agree to any term mentioned here within.