

# A B Crush (Panelcraft) Ltd

## Privacy Notice

Last updated 15.9.22 *(in draft and subject to approval by the directors)*

### Contents

<b>1</b>	<b>What does our company do? .....</b>	<b>2</b>
<b>2</b>	<b>How do we use your personal information? .....</b>	<b>2</b>
<b>3</b>	<b>How the law protects you .....</b>	<b>2</b>
<b>4</b>	<b>What information do we collect and process? .....</b>	<b>3</b>
<b>5</b>	<b>Data minimisation .....</b>	<b>3</b>
<b>6</b>	<b>If you choose not to give personal information .....</b>	<b>4</b>
<b>7</b>	<b>Why do we need your personal data? .....</b>	<b>4</b>
<b>8</b>	<b>Who may your personal data be shared with? .....</b>	<b>5</b>
<b>9</b>	<b>Do we get involved in direct marketing? .....</b>	<b>5</b>
<b>10</b>	<b>What rights do you have to amend personal information? .....</b>	<b>6</b>
<b>11</b>	<b>What if you want us to stop using your personal information? .....</b>	<b>6</b>
<b>12</b>	<b>How long do we keep your personal information? .....</b>	<b>6</b>
<b>13</b>	<b>Website and cookies .....</b>	<b>6</b>
<b>14</b>	<b>Contact us .....</b>	<b>8</b>
<b>15</b>	<b>Changes to this privacy notice .....</b>	<b>8</b>
<b>16</b>	<b>Document management .....</b>	<b>8</b>

## Data Privacy Notice

We take our obligations concerning data protection seriously. We provide a formal notice in order that data subjects (or potential data subjects) have information about how we collect and process personal information.

### 1 What Does Our Company Do?

A B Crush (Panelcraft) Ltd is an approved and accredited vehicle body repairer that repairs accident damaged vehicles and carries out other service, maintenance, conversion and bodywork for individuals, motor insurance companies, managed repair networks, fleets and local businesses. We work with contracted specialists and vehicle dealerships that supply us with parts, paint, materials, and services to enable us to carry out the required work.  
*(see website, quotes, invoices etc. for further information)*

### 2 How Do We Use Your Personal Information?

This privacy notice is to let you know how we, the companies we work with, and supply chain promises to look after personal information. This includes the information we gather, what has been passed on to us via an intermediary, and the choices you given about what information we share. This privacy notice explains how we do this, outlines privacy rights and how the law protects individuals.

We promise:

- To keep your data safe and private
- To manage your data based on your rights
- Not to sell your data

### 3 How The Law Protects You

As well as our privacy promise, individual privacy is protected by law. Data protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing outside the company. The law says we must have one or more of these reasons:

- To fulfil a contract we have;
- When it is in our legitimate interest;
- When it is our legal duty; or
- When consent is given.

A legitimate interest includes when we have a business reason to use personal information. But even then, it must not unfairly go against what is right, and we are obliged to give notification, for example in order to fulfil the service we offer.

## 4 What Information Do We Collect and Process?

In order for us to fulfil the service we offer it is legitimate and necessary to receive some personal data. "Personal Identifiable Data" (PII), for example, is information about which, either on its own or when connected with other data, allows us to identify an individual customer to provide a services The personal data we hold may include the following:

- Name and contact information (address, town, postcode, email and phone number);
- Credit card details and/or bank account details (if paying by cheque or bank transfer);
- Purchase details (including time, date and cost, and VAT status and insurance excess);
- Insurers details (if our work is part of an insurance claim);
- Vehicle information (make, model, registration number);
- Proof of identity (for example, valid driving licence and/or passport);
- Driving record in respect of speeding offences and points (for use of alternative transport);
- Personal image on security CCTV around our repairer sites;
- Work address and contact information;
- Calls and correspondence with us;
- Feedback; or
- Additional information related to employment with us and not covered above (for example, your bank or building society details, date of bith, relevant health details, gender status, national insurance number, training or qualifications, skills review, disciplinary record etc.)

Personal data will be collected or passed to us by your insurance company/fleet manager/vehicle recovery agent. However, some personal data may, where lawful to do so, or with your consent, be collected by us from third parties (for example, DVLA, to check speeding offences for use of courtesy vehicle, and others working lawfully on our behalf such as solicitors, accountants. IT support providers or management consultants).

## 5 Data Minimisation

Data minimisation is a principle that states that data collected or processed should not be held or further used unless for essential reasons clearly stated in advance. This is defined as information that is adequate, relevant and limited to what is necessary for the purposes for which its processed. This approach represents best practice for reducing the risk of unauthorised access and maintaining customer trust.

When processing and collecting data from our clients and customers we ask ourselves the following questions:

- How are we planning to use the data?
- Is there a way of achieving the purpose without having to collect the data?
- Does the individual know we are processing or collecting the data?
- Does the individual know why we are processing or collecting the data?
- How long will we need the data for to achieve the purpose?

## **6 If You Choose Not To Give Personal Information**

Individuals are not under obligation to provide us with personal information, but not providing certain data could lead to cancellation of our service or cessation of employment.

## **7 Why Do We Need Personal Data?**

We process personal data for a number of purposes, including:

- To organise specialist repair functions such as system recalibration with contracted third parties;
- To follow up with you shortly after the repair to your vehicle to check everything is satisfactory;
- For internal record keeping (to be able to respond to customer enquiry and invoicing);
- To make an appointment to assess the accident damage;
- For number plate recognition as part of our customer service and site security;
- To process payments by credit/debit card or bank account details;
- To update on progress or completion of a repair;
- To provide our services as requested or agreed;
- To help us improve the services we offer;
- To manage the employment relationship;
- To fulfil legal requirements.

This list is not exhaustive and may be updated from time to time. Contracted third parties are obliged to meet the same terms as here. We do not sell, rent or otherwise trade personal data.

## **8 Who May Your Personal Data Be Shared With?**

We work with vehicle manufacturers, insurance companies and accident management companies, as well as businesses supporting the function of our company (for example, our solicitors, accountants, IT support provider etc.). We may share basic personal data, such as name, contact details, claim number and vehicle details with the relevant company related to the service requested or your employment.

Limited personal information may also be made available to third parties providing relevant services under contract to us, such as vehicle specialists, engineers, auditors, compliance managers, insurance companies, IT hosting, management consultants, occupational health providers, payroll teams and maintenance providers). These companies may use information to perform their functions in accordance with the services we have requested and contract terms agreed as part of our service.

We may also disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law (for example DVLA or HMRC). Also in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of personal information. We store all the personal information provided on our secure servers. All electronic transactions made to or received from us will be encrypted using SSL technology.

Data transmission over the internet is inherently insecure and no organisation can wholly guarantee the security of data sent over the Internet. Data subjects are responsible for keeping passwords and user details confidential.

In the event that we sell our business, we may share details with the buyer to enable them to fulfil the service we have agreed.

Personal information will not be transferred to, stored or otherwise processed outside the EU. Our data minimisation policy limits information to what is necessary for the purposes for which they are processed. International transfers of data between any of the countries we operate in is limited to operational and financial information. Personal information is not transferred.

## **9 Do We Get Involved In Direct Marketing?**

We do not take part in any direct marketing activities apart from requests for optional customer service feedback. We hope the quality of our service will be enough to result on a recommendation for others to contact us or view our website.

## **10 What Rights Do You Have To Amend Personal Information?**

Data subjects have the right to review the personal data held by us and have inaccurate information corrected. To understand more about our data processing activities or to request access to personal information, please contact our customer support team or email [nathan@abcrush.co.uk](mailto:nathan@abcrush.co.uk).

## **11 What If You Want Us To Stop Using Your Personal Information?**

Data subjects have the right to object to our use of personal information, or to ask us to delete, remove, or to stop using your personal information if there is no need for us to keep it. This is known as the 'right of erasure' or the 'right to be forgotten'. There may be legal, warranty related or other reasons why we need to keep or use data, but data subjects are encouraged to tell us if they think that we should not be using it.

## **12 How Long Do We Keep Your Personal Information?**

We will keep details on record for as long as it is necessary in line with statutory requirements. We hold booking, invoice and email details for up to seven years. They are then deleted in accordance with data protection and other applicable legislation. Should an individual wish to make a warranty claim after this period, a copy of our invoice or our completed guarantee would need to be provided. Data not required to retain by law, such as speeding offence details for the provision of alternative transport will be promptly deleted following completion of service or employment.

## **13 Website and Cookies**

The cookies on our website are used with consent. We ask individuals to agree to their use when you first enter the site. We use session cookies and analytics cookie. These are for tracking usage and performance, and never used to correlate usage data with individuals.

If an individual elects not to accept or to block cookies, they may not be able to use the tracking and communication facilities on our website.

We may collect, store and use the following kinds of personal information on our website:

- Information about a data subject's computer and their visits to and use of our website, such as an IP address, geographical location, browser type, referral source, length of visit and number of page views;
- Information relating to any transactions carried out between the data subject and us on or in relation to our website, including information relating to any purchases of our goods and services;
- Information provided for the purpose of registering with us.
- Information provided to us for the purpose of subscribing to our website services, email notifications and / or newsletters.
- Any other information not requested but voluntarily provided, if appropriate.

A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server, which enables the web server to identify and track the web browser.

We may send a cookie, which may be stored on a data subject's browser or computer's hard drive. We may use the information we obtain from the cookie in the administration of our website, to improve the website's usability. We may also use that information to recognise the data subject's computer when visiting our website, and to personalise website content.

Most browsers allow users to refuse to accept cookies, however, this may have a negative impact upon the usability of many websites, including ours.

Personal information submitted on our website may be used for the purposes specified in our privacy notice (or notices) or in relevant parts of our website. We may use personal information to:

- Administer our website;
- Improve browsing experience by personalising the website;
- Enable use of the services available on our website;
- Send general (non-marketing) commercial communications;
- Send email notifications which have been specifically requested;
- Provide third parties with statistical information about our users without identifying any individual user;
- Deal with any enquiries and complaints made relating to the website

We will not, without express consent, provide personal information to any third parties for the purpose of direct marketing and we will not provide your information to third parties as outlined in our privacy notice or notices.

Our website contains links to other websites (e.g. your insurer's website). We are not responsible for the privacy notices, policies or practices of third party websites. Please visit your insurer website if you wish to view their privacy notice / policy.

## 14 Contact Us

If a data subject has any questions about our privacy notice or notices or our treatment of personal information, we may be contacted by email at [nathan@abcrush.co.uk](mailto:nathan@abcrush.co.uk) or by post at Nathan Crush, A B Crush (Panelcraft) Ltd, Wootton, nr Canterbury CT4 6RY.

## 15 Changes To Our Privacy Notice

We may change this Privacy Notice from time to time in order to reflect changes in the law.

## 16 Document Management

The owners of this document are the directors who update and evaluate it at least once per annum.

As at September 2022 the above represents the suggested text for Version 2 of our Privacy Notice, to be uploaded to our website and filed with our data protection record. This has been submitted to the directors for approval and is intended to replace Version 1 (May 2018) by no later than December 2022.

When evaluating the effectiveness and adequacy of this document, the following criteria is considered:

- Number of incidents relating to the privacy notice;
- Employee awareness and engagement in the privacy notice;
- Changes to client requirements related to the privacy notice;
- Changes to legal, regulatory, contractual and other requirements.

*Nathan Crush*