

What is a Privacy and Cooke Policy?

Our Privacy and Cookie Policy is here to help you understand how we process your data, this includes why we need it and who we share it with.

At Cleevely Electric Vehicles we're committed to protecting and respecting your privacy. Our priority is to ensure that we treat our customers fairly and comply with UK and EU regulations therefore if there is anything you are unsure of please do not hesitate to contact us.

Any questions regarding this Policy and our privacy practices should be sent by email to info@cleevelyev.co.uk by phoning 01242 308006 or by writing to:
Cleevely Electric Vehicles, Unit 41a Lansdown Industrial Estate, Cheltenham, GL51 8PS

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Our website

This Policy also explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure. The information contained in this website is for general information purposes only.

The information on our website is provided by Cleevely Electric Vehicles Limited and while we endeavor to keep the information up to date and correct, we make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the website or the information, products, services, or related graphics contained on the website for any purpose. Any reliance you place on such information is therefore strictly at your own risk.

Third party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

We have no control over the nature, content and availability of those sites. The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this website.

Every effort is made to keep the website up and running smoothly. However, Cleevly Electric Vehicles Limited takes no responsibility for, and will not be liable for, the website being temporarily unavailable due to technical issues beyond our control.

Use of 'cookies'

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to do this depends on your computer, you will be able to find how to do this on the internet. Turning cookies off may result in a loss of functionality when using our website.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Main Cookies used on our site

Google Analytics

These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited

For more information on Google Analytics' privacy policy visit here <http://www.google.com/analytics/learn/privacy.html>

Google Maps

We may sometimes use Google Maps third party cookies, which are unique identifiers to allow traffic analysis to Google Maps.

Data protection principles

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner that ensures appropriate security.

Information you give to us

How is your information used?

We require your consent to process and store your data and to get in touch with you regarding offers and services that might be of interest to you. At any point you have the right to withdraw your consent, to do so please contact us on the details above.

If you have chosen to opt-in to our direct marketing communications then we will use your data to:

- send you communications which you have requested and that may be of interest to you. This may include updates about products and services, news, events, promotions and special offers;
- deal with entries into a competition;
- seek your views or comments on the services we provide;
- notify you of changes to our services;

We do this on the grounds of consent.

If you are an existing customer we may contact you from time to time with service and products offer on the grounds of legitimate interest. We will also contact you when your next MOT or service is due.

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or if is set out in any relevant contract you hold with us.

Who might we pass your data to?

We will not sell or rent your information to third parties. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Third Party Service Providers working on our behalf:

We have a carefully selected list of suppliers, delivery agents, collections agents and others with who your data may have to be shared with, we do ensure that it is shared in the most protected way and that the company with who we are sharing it with are compliant and regulated. An example of this is where we have to pass your details on to a delivery agent so that they can deliver the vehicle to you.

We may also pass your information to:

- our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send you mailings);
- analytics and search engine providers that assist us in the improvement and optimisation of our website, and
- our professional advisers (including solicitors, bankers, auditors and insurers);
- credit-reference and fraud prevention agencies.

However, when we use third party service providers, we require that they respect the security of your personal information and to treat it in accordance with the law. We disclose only the personal information that is necessary to deliver the service. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Data Privacy Notice

Information regarding the personal data that we hold

You agree that we may use and update this centrally held information:

- to provide you with services
- to update our records about you

We may also use your information for research and statistical analysis with the aim of improving our services, with your approval.

What data do we usually ask for?

We may request that you supply us with personal information, sometimes sensitive, as this is required in order for us to offer our services and products to you. The following outlines the ways in which we will gather data from you:-

- via our online or paper-based forms where the information is entered by yourself
- via any email communication that we may have with you
- via our social media channels if you choose to correspond with us in that way
- when we meet with you at our premises, at events or elsewhere;

- giving us your business card,
- entering a competition, promotion or survey organised by us, or otherwise providing us with feedback;
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you, or;
- corresponding with us by phone, email, letters or otherwise.

We may collect, use, store and transfer different kinds of personal information about you, including:

your name, address, email address, telephone number, IP address, vehicle information in relation to services we provide, and information regarding what pages on our website are accessed.

The data that we require can often vary however generally speaking when brokering finance on your behalf we require:

- Your title, such as Mr., Mrs., Dr Etc...
- First name(s), surname or company name
- Address
- Contact numbers
- Email address
- Date of birth
- Income and expenditure
- Employment details
- bank details
- VAT ID number

We will use your personal information along with any other information that we may obtain from other sources for dealing with your enquiries, customer services, and administration, considering and processing your application for our products and/or services, for marketing, for credit searches and to ensure that the content, services and advertising that we offer are tailored to your needs and interests. We may also share your information with potential lenders, service providers, vehicle suppliers, agents and affiliates for these purposes.

- Your information will be passed to lenders so that they can assess your application for credit. They will also use your data to prevent fraud, to check your identify and to prevent money laundering. They might (i) search the files of credit reference agencies Equifax and/or Experian (or any other credit reference agency that we may use from

time to time) who will record any credit searches on your file; and (ii) disclose details of how you conduct your account to such agencies. The information will be used by other credit grantors for making credit decisions about you and the people with whom you are financially associated, for fraud prevention, money laundering prevention and occasionally for tracing debtors. Information used for these purposes will include publicly available information such as electoral roll, county court judgments, bankruptcy orders or repossessions.

It is important that you provide us with accurate information.

If inaccurate or false information is provided this may affect your ability to obtain credit now and in the future and if fraud is identified the details of this will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities
- Managing credit and credit related accounts or facilities

Please contact us at the address shown above if you want to receive details of the relevant fraud prevention agencies. We and other organisations may access and use, from other countries, the information recorded by fraud prevention agencies.

Another person's records will be 'associated' with you, by us and/or credit grantors, when:

1. You make a joint application
2. You advise us of a financial association with another person
3. The credit reference agencies have existing linked or 'associated' records.

This 'association' will link your records at the credit reference agencies and will be taken into account in all future applications by either or both of you. This shall continue until one of you applies to the credit reference agencies and is successful in filing a 'disassociation'. You MUST therefore ensure when making a joint application or advising us of some other financial association that you are entitled to:

1. Disclose information about your joint application

2. Authorise us to search, link or record information at a credit reference agency/ies about you and anyone referred to by you.

We may disclose personal data in order to comply with a legal or regulatory obligation.

If you would like to know more about credit reference agencies please read the following document - CRAIN: <https://experian.co.uk/crain/index.html>

We intend to continue improving the content and function of our Website. For this reason, we may monitor customer traffic patterns and Website usage to help us improve the design and layout of our Website and provide content that we think will be of interest to you.

We may keep your information for a reasonable period of time to comply with regulation. By providing us with your personal information you consent to our processing your personal information for the above purposes.

How do we protect your information?

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used.

Our staff receive training in line with this policy and we have a secure office. Any access to your data is done so for the purpose of providing you with a service and is only done by the appropriate persons.

Your choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about our products and services, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

You can change your marketing preferences at any time by emailing us on: info@cleevelyev.co.uk

Under the GDPR you have the right to data portability.

How you can access and update your information

The accuracy of your information is important to us. You have the right to request a copy of the information we hold about you so that you can ensure its accuracy. You can do this via the following methods:

- By sending an email to the administrator to request the information held about you: info@cleevelyev.co.uk

By writing to us at: Cleevely Electric Vehicles, Unit 41a Lansdown Industrial Estate, Cheltenham, GL51 8PS

We will provide a copy of the information that we hold on you in a structured and commonly used format and make it available to another data controller at your request. Please be prepared to prove your identity and explicit consent of where this data will be sent to.

Your rights

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information.
- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.

- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which is more important than your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact us by writing to the address at the top of this policy, or by emailing us at: info@cleevelyev.co.uk

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

Opting out of receiving marketing communications

You can ask us to stop sending you marketing communications at any time by writing to the address at the top of this policy, or by emailing us at: info@cleevelyev.co.uk

How long we will store your personal information

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Where we use/store your data because it is necessary for our legitimate business interests, we will use/store your data for as long as it is necessary for our legitimate business interests, or such earlier time as you ask us to stop.

Where we use/store your data because you have given us your specific, informed and unambiguous consent, we will use/store your data until you ask us to stop.

Automated decision-making

We do not use automated decision-making processes.

Identifying you as a client of our business

If you are a client, we may identify you as a client in our marketing material, although we will never do this without requesting your permission first. If you do not agree to us identifying you as a customer, please notify us by writing to the address at the top of this policy, or by emailing us at: info@cleevelyev.co.uk

Changes to our policy

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email or via social media. Please check our website frequently to see any updates or changes to our policy.

Contact

Questions, comments and requests regarding this policy are welcomed and should be addressed to Cleevely Electric Vehicles by writing to the address at the top of this policy, or by emailing us at: info@cleevelyev.co.uk

Where we store your information

All information you provide to us is stored on our secure servers in the United Kingdom, or on secure cloud-based services in a country within the European Economic Area.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely.

Data Breaches

Should a data breach occur or we believe that your data has been compromised we will notify you and the Information Commissioners Office without undue delay.

Subject Access Requests

Under the GDPR you have the right to a subject access request, this is a copy of any personal information that we hold about you. The request is free to make however if we feel the request is manifestly unfounded or excessive we do reserve the right to charge a fee for this which will be decided based on the level of work involved with the request. We will respond to your request without delay and at the latest within 40 calendar days. Should you wish to make a subject access request please do so in

writing to: Cleevely Electric Vehicles, Unit 41a Lansdown Industrial Estate,
Cheltenham, GL51 8PS

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.