

Overview

Maintaining the security of your data and ensuring that you are in control of how your data is handled is a priority at Gowan Motors. We are dedicated to ensure transparency about the data we collect about you, how we use it and the conditions whereby we may disclose your data to others. Throughout this document, “we”, “us”, “our” and “ours” refer to Gowan Motors

This privacy policy details the process through which Gowan Motors collects and processes your personal data. This will help you decide how you want to use our website, products and services. We may collect personal identification information from data you provide when accessing this website or other websites controlled by Gowan Motors, when you make an enquiry about a product or service, when you purchase a product or service from us, through your dealings with our staff, enter a competition, promotion or survey.

This website is not intended for children and we do not knowingly collect data relating to children. No parts of our website are structured to attract anyone under 17. This privacy policy covers Gowan Motors consumer websites.

Personal Data We Collect

Service Booking: If you have purchased a vehicle from Gowan Motors or you have previously had a service at one of our dealerships our aftersales system will have stored your information.

Contact Data: Various forms and enquiry sections allow you to provide us with contact data for the purpose of contacting you with a quote, offer or other legitimate business related activity. This includes home address, email address and telephone numbers.

Identity Data: When you complete a form or other entry on the website it may include identity data. This could include first name, last name, title, date of birth and gender.

Marketing and Communications Data: This includes your preferences in receiving marketing from us and our third parties and your communication preferences, occupation, vehicle details and transaction history.

Usage Data: Analytical data is gathered for digital marketing purposes and can include information about how you use our website.

Technical Data: Cookie information is gathered upon visiting this website. This includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Financial Information: Detailed financial information including all facets of information required for finance applications. If you provide this information online it may be shared with third party financial institutions for the purpose of attaining financial quotations.

Interactions Data: information about your interactions with us, including correspondence and phone calls between us and you.

Test Drive or Courtesy Car: If you book a test drive or take a courtesy car from our service department we require a copy of your driving licence, we will store a copy of this in case of any speeding, parking or other motoring offence that may occur.

Personal Data and How We May Use It

Any information about an individual from which that person can be identified is referred to as personal data. In this case Gowan Motors are the Data Controller. This means that we may collect, use, store and transfer different kinds of personal data about you. The below situations outline when and how we will use your personal information/data:

- To complete a contract we are entering or have already entered with you.
- To complete a legal or regulatory obligation
- To update you as a new customer
- To register a vehicle you purchase from us for VRT and VAT
- To present you with a quote for a repair or service
- To facilitate the purchase of a vehicle with you
- To quote you on any finance, leasing or insurance products
- To provide you with marketing communications by post, text and email

We may also use your personal information to manage our everyday business needs, including accounting and to prevent fraud. Where we do so we rely on the lawful processing ground of legitimate interest and our legitimate interest is in the effective management of our business.

Grounds of Processing Personal Data

We rely on the bases of legitimate business interest to send marketing communications to our customer database, we have a legitimate interest in marketing our goods and services to existing customers to increase sales. We collect personal usage data from websites to perform analytical tasks that allow us to better manage marketing processes and expenditure. This is done under our legitimate business interest to effectively manage our business expenditure.

In certain cases it may be necessary to process what Article 9 of the GDPR defines as "*special categories*" of personal data. Examples of the special categories are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data processed for the purpose of uniquely identifying a natural person, data concerning health including medical and employment history and data concerning a natural person's sex life and/or sexual orientation.

We may need to collect such data such as details of your health (for example so that we can make reasonable accommodation for you within our building or in connection with the sale of any product that may need to be

If you fail to provide us with this information, or you object to us processing such information the consequences are that we may be prevented from processing your product order or continuing to provide all or some of our services to you.

Transferring your personal data outside the EEA

Information we collect will not normally be processed in or transferred to any country or territory outside of the European Economic Area (EEA). It may however be necessary to transfer your personal data outside the European Economic Area ("EEA") in connection with the lawful basis for processing to jurisdictions which may have less stringent data protection laws.

When we, or our permitted third parties, transfer your personal data outside the EEA, we or they will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the EEA.

If we transfer your personal data outside the EEA in other circumstances (for example because we have to provide such information by law), we will put in place appropriate safeguards to ensure that your personal data remains adequately protected.

We may share anonymised and aggregated information with third parties for data analytics, research, and promotional purposes.

Third-Party Websites

Certain elements of our website may include links to third-party websites, plug-ins and applications such as supplier brand websites. If you decide to click on a third party link thus enabling a connection, those connections may allow third parties to collect or share data about you. When you leave any of our websites, we encourage you to read the individual privacy policy of every website you visit.

Promotional Marketing

We may use your personal information for direct marketing purposes to make you aware of products and services which may interest you or for customer satisfaction surveys where you have not objected to us doing so. As part of our marketing activities, we may also use your personal information (including, where permitted by you and your finance provider, any finance details) to analyse your suitability for trade-ins or upgrades. We may do this by phone, post, email, text or through other digital media. Where we do so we rely on the lawful processing ground of legitimate interest and our legitimate interest is to develop relationships with our existing customers and to assess our performance and standards.

Opting out

If you would like to opt-out from receiving marketing communications at any stage you can ask us directly or any other third party company we use to provide you with a message. We always provide an opt-out option on email and text message communications and this is designed to be as simple and straightforward as possible.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law

Transfers outside the EEA

We may transfer your personal data outside of the European Economic Area. These countries do not always afford an equivalent level of privacy protection and in such circumstances we will take specific steps, in accordance with data protection law, to protect your personal information. In particular, for transfers of personal data, outside the EEA where there is no adequacy decision by the European Commission we may rely on contractual protections approved by the European Commission.

Sharing Data with Third Parties

Manufacturer of Your Vehicle & Their Distributor: We pass your personal information on to the manufacturer of the vehicle you purchase and/or their appointed distributor in Ireland for the purposes of warranty, safety, recall and customer satisfaction surveys. If you consent we will also pass your information to the manufacturer distributor of the vehicle you purchase or their appointed distributor in Ireland for marketing activities. The manufacturer or its appointed distributor may contact you separately about their use of your information.

The Revenue Commissioners: We may sometimes share your information where we do the first registration of your motor vehicle or where we apply for exemptions from VRT. VAT and/or motor tax for you.

Third Party Service Providers: We may share your personal information with third party service providers that perform services and functions at our direction and on our behalf such as our accountants, IT service providers, printers, lawyers and other business advisors, marketing companies who carry out marketing campaigns on our behalf and providers of security and administration services.

Financial & Insurance Providers: leasing companies, insurance companies and other third party providers: Where you have asked for a quote to include the cost of financing, leasing or any other third party product, we may pass your personal information to that third party in order to obtain a quotation on your behalf.

Potential Sale of the Dealer: We may also transfer your personal information to companies we plan to merge with or be acquired by.

An Gardaí, Government Bodies or officials: We may share your personal information with an Gardaí or other government bodies or agencies where required to do so by law.

Data Security

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 those employees, agents, contractors and other third parties who have a business need to know. 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 personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Future Privacy Policy Updates

Edits we make to this privacy policy in the future will be updated on the website. To ensure the personal data we hold about you is accurate and current. At any time if your personal data or circumstances change please keep us informed. This will help us ensure the personal data we hold about you is accurate and current.

Accessing Your Personal Information

You have several rights under data protection law in relation to how we use your personal information. You have the right, free of charge, to:

1. check what type of personal data we hold about you and what we do with that information.
You are also entitled to receive a copy of this information
2. rectify any inaccurate personal information we hold about you
3. erase personal information we hold about you
4. stop us from using your personal information in certain cases, including if you believe that the personal information we hold about you is inaccurate or our use of your information is unlawful. If you exercise this right, we will store your personal information and will not carry out any other processing until the issue is resolved;
5. object to us using your personal information where we rely on our legitimate interests to use your information. We will stop using your personal information unless we can demonstrate an overriding legitimate grounds for the continued processing of this information; and
6. receive your personal information in a structured, commonly used and machine-readable format and to have that data transmitted to another data controller.

These rights are in some circumstances limited by data protection legislation. We will endeavour to respond to your request within a month. If we are unable to deal with your request within a month we may extend this period by a further two months and we will explain why.

You also have the right to lodge a complaint to the office of the Data Protection Commission. See www.dataprotection.ie

How long will we retain your data?

It is our policy not to keep personal data for longer than is necessary, for the purposes that are set on in this data privacy notice and for long as is required to do so in order to meet any legal obligations that we are bound by.

We will hold your personal data for the longer of the following periods:

- To honour any contractual obligation with you; or
- To comply with any retention period required by law; or
- The expiry of any limitation period in respect of which investigations or litigation may arise.

Personal Data Recording

We operate CCTV in all of our dealerships to monitor our premises, therefore your image and vehicle registration may be captured if you enter the premises.

Some of our phone calls are recorded for sales and training purposes. In the unlikely event of a customer dispute this information may be used to deal with the situation accordingly.

How to Contact Us

Please contact us if you have any questions about our privacy notice or information we hold about you:

By email: dataprotection@gowanmotors.ie

Or write to us at: Gowan Motors, Mill Lane, Ashtown, Dublin 15.