

PRIVACY NOTICE

Euro Car Parts Limited is a company registered in England and Wales (hereinafter referred to as "we", "our" or "us").

OVERVIEW

Maintaining the security of your data is of paramount importance to us and we are committed to respecting your privacy rights.

This notice, which including without limitation applies when using the website: www.autoeducationacademy.com ("our website"), provides you with information about:

- How we use your data;
- What personal data we collect;
- Who we share your data with;
- How we ensure your privacy is maintained; and
- Your rights relating to your personal data.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of the General Data Protection Regulation (EU Regulation 2016/679, when applicable, the "GDPR"), and the EU Data Protection Directive (Directive 95/46/EC), the data controller is Euro Car Parts Limited of T2 Birch Coppice Business Park, Danny Morson Way, Dordon, Tamworth, England, B78 1SE.

INFORMATION WE MAY COLLECT FROM YOU AND OTHER SOURCES

Although the precise details of the personal information collected will vary according to the specific purpose for which we are collecting the information, we may collect and process the following data about you:

- Personal that you provide by filling in our Customer Application Form or forms on our social media pages or on our website. This includes information provided at the time of registering to use our website or subscribing to our service and may include the following:
 - Name
 - Contact Information (Address, Email, Phone number)
 - Allergy information that you provide to us
 - Your Institute Motor Industry registration number
 - Education history
 - Certificates of qualifications
 - Exam/ test results

- If you contact us by phone, email or otherwise and is provided voluntarily, we may keep a record of that correspondence.
- Please note that we record and monitor telephone conversations that we have with you. The sole purpose of any recording is for training and quality control purposes. Under the GDPR any personal or confidential information disclosed shall not be made available to any third party (unless required by law to do so) or used for marketing purposes. Recorded conversations are deleted within three months after the recording was made.
- We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We collect some of this information using Cookies, see below and our cookies policy at [here](#). We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To ensure that content from our website is presented in the most effective manner for you and for your computer;
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- To carry out our obligations arising from any contracts between you and us. For example:
 - We may pass your contact details to our third parties who provide software for the training platforms as well as third parties who provide training courses through our website (e.g. City and Guilds);
 - We may pass your contact details to our any regulatory authority in the motor when you register to complete certain training courses (such are MOT training courses).
- To allow you to participate in interactive features of our service, when you choose to do so;
- To notify you about changes to our service;
- If you are an individual and an existing customer, we will only contact you by electronic means (email or telephone) with information about goods and services that we offer. We will not contact you by email if you have unsubscribed from our mailing list., or by phone if you are registered with the Telephone Preference Service (and have not expressly indicated that we may continue to call you notwithstanding your registration);
- If you are an individual and a new customer, we will only contact you by electronic means if you have consented to this;
- Whether you are a new or existing customer, if you have consented to being contacted electronically we will contact you in accordance with your consents;
- To verify your identity;

- To communicate with you about educational courses that you may have declared an interest, enrolled in or completed;
- To develop the education and training content we can offer;
- To link the education history of a customer with the sales, returns and warranties of that their garage.

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.

COOKIES

Our cookie policy can be found [here](#).

DISCLOSURE OF YOUR INFORMATION

To make certain services available to you, we may need to share your personal data with third parties.

- We may disclose your personal information to:
 - any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
 - our trusted service providers acting on our behalf who provide services such as training providers, regulators in the motor industry, email marketing data, auditing services and other services to enable them to provide services;
 - selected third parties, such as our garage customers,
 - our affiliate websites that may use your personal information in the ways set out in the "how we use your information section" above or in connection with products and services that complement our own range of products and services; and
- In the event we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Euro Car Parts Limited substantially sell all its assets or are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Euro Car Parts Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

International Transfers

It is sometimes necessary for us to share your data outside of the European Economic Area (EEA). This generally occurs when our service providers are located outside of the EEA or you are based outside of the EEA.

If this happens, we will ensure that the transfer will be compliant with the relevant data protections laws including the GDPR.

Our standard practice is to use standard contractual clauses which have been approved by the European Commission for such transfers. Those clauses can be accessed [here](#). Where standard contractual clauses are not used and your data is transferred to the United States, we will ensure that the service providers have signed up to the EU-US Privacy Shield which is a framework designed to protect the fundamental rights of anyone in the EU whose personal data is transferred to the United States for commercial purposes.

HOW DO WE PROTECT YOUR DATA

We are committed to keeping your personal data safe and secure and we use reasonable, organisational, technical and administrative measures to protect personal information under our control. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

For registered users, where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

The personal data that you provide to us to purchase goods and other personal data generated for transactional agreements is processed as it is necessary for the performance of a contract with you.

All other personal data is processed for our legitimate interests (as set out below) and to comply with our legal obligations.

If you are an individual, in general, we only rely on opt-in consent as a legal basis to contact (and allow for selected third parties to contact) new customers by electronic means and/or send direct marketing communications via email or text message to new customers.

You have the right to withdraw your consent at any time.

Our legitimate interests

The normal legal basis for processing customer data, is that it is necessary for our legitimate interests including:

- selling and supplying goods and services to our customers;
- protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our products and services;
- sending promotional communications which are relevant and tailored to individual customers;
- understanding our customers' behaviour, activities, preferences, and needs;
- complying with our legal and regulatory obligations;

- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- handling customer contacts, queries, complaints or disputes;
- managing insurance claims by customers;
- protecting us and our employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to us;
- effectively handling any legal claims or regulatory enforcement actions taken against us; and
- fulfilling our duties to our customers, colleagues, shareholders and other stakeholders.

YOUR RIGHTS

If you are an individual and at any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below in the "Contact" section.

All the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

You can also exercise the right at any time by contacting us at Euro Car Parts Limited by any of the means outlined below.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

HOW LONG DO WE KEEP YOUR DATA?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Our procedures to manage data retention is to retain customer data for 7 years to support some of our parts warranty.

We will take reasonable steps under Article 17 of the GDPR to meet data subject requests.

CHANGES TO OUR PRIVACY NOTICE

Any changes we may make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail.

CONTACT

If you have any questions about how we use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- Email us on: sars@eurocarparts.com
- Write to use at: Euro Car Parts Limited, Legal Department, T2 Birch Coppice Business Park, Danny Morson Way, Dordon, Tamworth, England, B78 1SE

You have the right to make a complaint at any time to the local data protection supervisory authority which, for the UK, is the Information Commissioner's Office (ICO (www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Issue Date: 24 August 2018