

## Privacy Policy

**Midlands JCB Limited** is committed to protecting your personal information and complying with the General Data Protection Regulations (GDPR). This policy describes how we collect, use, store and disclose your personal information.

This policy applies to any personal information provided by you to **Midlands JCB Limited** or which is provided to **Midlands JCB Limited** by third parties.

The data controller in respect of personal information processed under this policy is **Midlands JCB Limited** (a company incorporated in England with company number 14542199) whose registered office is at is Halfords Lane, Smethwick, West Midlands B66 1EL.

**Midlands JCB Limited** also works with approved finance partners to deliver financing solutions to customers in relation to JCB Products (JCB Finance Partners).

It is important that you read this privacy policy so that you are fully aware of how and why we are using your personal information.

### WHY DO WE COLLECT PERSONAL INFORMATION ABOUT YOU?

**Midlands JCB Limited** collects personal information about you to provide you with our products and services and to improve and develop these for the future.

### WHAT PERSONAL INFORMATION DO WE COLLECT?

**Midlands JCB Limited** collects the following types of personal information about you:

- Name
- Date of Birth
- Address and address history
- Contact details such as email address and telephone numbers
- Financial information and credit history
- Employment details
- Identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address
- Vehicle and/or machine registration and identification numbers
- Telematics information about the location of your vehicle and/or machine.

### How do we receive personal information about you?

Midlands JCB Limited receives personal information about you:

- When you contact us directly, visit our website [www.midlandsjcb.com](http://www.midlandsjcb.com) or use our social media channels, whether to apply for one of our products or services or to make an enquiry or other request.
- Midlands JCB Limited is an approved dealer of J C Bamford Excavators (JCB). If you approach JCB they will provide us with your personal data based upon the machine specification and your geographical location.
- From other JCB Dealers and JCB Finance Ltd and approved business affiliates
- From our other group companies and our carefully selected business partners who provide products and services, such as introducing brokers, fraud prevention or credit reference agencies or trade bodies.

## **How do we use Personal Information about you?**

Midlands JCB Limited may use your personal information for the following purposes:

- To verify your identity and to identify you when you contact us.
- To verify any verbal correspondence
- As a precursor to entering into or fulfilling a contractual obligation.
- To make decisions on credit for your business.
- To comply with legal obligations.
- To help administer, and contact you about improved administration of, any accounts, services and products we have provided before, or provide now, or in the future.
- Recover debts that you owe and trace your whereabouts.
- To carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical information using data provided by you.
- To carry out statistical analysis to help with decisions about account management.
- To contact you for marketing purposes relating to products and services that we think will be of potential interest to you.
- To help monitor and improve customer service

Any personal data provided to third parties for the purpose of financing will be processed in accordance with their Privacy Policy. Please refer to the Privacy Policy of the financial organisation for details on how your personal data is processed.

We retain the right, to access, view and interrogate JCB Livelink or any successor telematics system operating on JCB Products that have been supplied by us. We may use this system to verify the location, mode of operation, service history or/any other information held on the system regarding operation and/or performance of such JCB Products.

## **Who do we provide this personal information to?**

Midlands JCB Limited will provide your personal information to:

- The JCB group if you are acquiring or are interested in acquiring JCB Products.
- Subcontractors such as other JCB Dealers, Hauliers, Painters or Service Providers engaged in the course of providing our Services to you.
- Affiliated manufacturers if you are acquiring or are interested in acquiring their products.
- Financial services providers, such as our preferred supplier of finance facilities JCB Finance Ltd.
- Fraud prevention agencies, trade bodies and credit reference agencies
- Marketing providers.
- Third party debt collection agencies, insolvency practitioners and legal advisors.
- JCB Finance Ltd who provide machinery quotation software to us.
- Our service providers who perform services on our behalf, such as banking services and data management firms.

- Law enforcement agencies, government departments, courts, regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities.

### **What will Midlands JCB Limited do when you apply for our products or services?**

Before we provide products or services to you, Midlands JCB Limited may undertake checks to verify your identity. Midlands JCB may carry out credit searches, via a financial services provider, at any stage of the quote or purchase process, or where credit levels are adjusted. We may keep a record of this check for a maximum period of 1 month from the date of the record.

### **Where we store your information?**

All personal information we have about you is stored on secure servers operated by Midlands JCB or its third-party service providers.

### **How long will we keep personal information about you?**

Midlands JCB Limited will keep a copy of your personal information for as long as we have a contractual relationship with you, or from the point of a machine or product purchase, and for a period of 7 years thereafter. For personal information which is not linked to a machine / parts / service purchase we will keep this for a period of 2 years from the date of the record. All Sales Master quotes will be kept for 12 months from the point of quote. Telephone recordings will be kept for 90 days.

We may keep your data for longer periods if we cannot delete it for legal, regulatory or technical reasons. Maintaining your personal information for these periods allows us to keep accurate records for our legal obligations and to handle any future complaints.

### **Data Transfers**

Midlands JCB Limited does not transfer your data outside the European Economic Area (EEA). Whenever fraud prevention agencies transfer your personal data outside of the EEA, they impose contractual obligations on the recipients of that information to protect it to the standard required in the EEA.

### **Cookies**

Midlands JCB Limited does not track Cookie Data.

### **Your rights**

You have the following rights in connection with your personal information processed by Midlands JCB Limited

Access – you can request access to your personal information (and a copy, in a structured, commonly used and machine-readable format) and further details about how your personal information is handled by Midlands JCB Limited.

Object – you have the right to object to our processing of your personal information for direct marketing purposes.

Rectification – you can request rectification of any incorrect personal data held about you.

Erasure – you can request erasure of any personal data where the processing is based on explicit consent.

To manage your rights and delivery preferences please follow the instructions in our marketing communications, enquiry forms or write to us at:

Post: Marketing Department, Midlands JCB, Halfords Lane, Smethwick, West Midlands ,B66 1EL

Email: [enquiries@midlandsjcb.co.uk](mailto:enquiries@midlandsjcb.co.uk)

You can also opt-out from us passing your information to the other businesses listed above.

You can exercise any of these rights at any time by contacting us using the contact details provided above.

If you are concerned or have questions about how Midlands JCB handles your personal data please contact us and we will do our best to assist you. Please note that you have the right to lodge a complaint with the UK Information Commissioner's Office (or any other appropriate supervisory authority), which may be accessed through the following link <https://ico.org.uk/concerns/> .

## **CHANGES TO OUR PRIVACY POLICY**

Midlands JCB reserve the right to revise this privacy policy or any part of it from time to time. Please check back frequently to see any updates or changes to our privacy policy.

## **CONTACT DETAILS**

Questions, comments and requests regarding this privacy policy should be addressed to [enquiries@midlandsjcb.com](mailto:enquiries@midlandsjcb.com)