



## PRIVACY NOTICE

### West Pennine Trucks Limited

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### INTRODUCTION

West Pennine Trucks Limited is committed to protecting and respecting your privacy. Please see the end of this Privacy Notice for our contact and legal information.

This Privacy Notice describes the data we collect about you when you interact, communicate or transact with us, including with our website, social media pages and premises. It gives you detailed information about what we do with your data and how we keep it safe, as well as how you can exercise your data protection rights.

This Privacy Notice aims to give you clear guidance on how we use your data and what your rights are, but if you have any further questions, please do contact us. You will find our contact details at the end of this Privacy Notice which you can use if you have any questions, including how to update or access your personal information or to make a complaint.

**This Privacy Notice may change over time. If there are any significant changes, we will contact you and explain the changes. The latest version of this Privacy Notice will appear at <https://www.scania.com/uk/en/westpennine/admin/misc/legal/Business.html> so please always check there to ensure you are accessing a current version.**

- **To make this Privacy Notice easier to read, we use a few definitions: Contact Information** means your name, business name, address, telephone numbers and email addresses.
- **Vehicle Identification Information** means registration number and chassis number;
- **Vehicle Generated Information** means:
  - (i) performance data such as vehicle components, fuel consumption, brake usage, gear shifting, battery usage, engine data and error codes; and (ii) geographic position; and
  - (iii) in-vehicle entertainment information



## WHO IS WEST PENNINE

A data 'controller' is the company that decides why and how your personal information is processed.

When you deal with us, the controller of your personal information is West Pennine Trucks Limited. We sometimes work with other organisations in connection with some of the processing activities described in this Privacy Notice, such as social media platforms. Where that information is collected and sent to other organisations for processing that is for a common purpose or purposes, we will be making decisions together in relation to that particular processing and will be 'joint controllers' with the organisations involved. As joint controllers, we and the other organisations involved in making these decisions will be jointly responsible to you under data protection laws for this processing. In other circumstances, such as in relation to companies in our corporate group or the dealer network, the organisation receiving your information will be separately responsible to you and use your personal information in the ways described in its privacy statement (and not ours).

Where this Privacy Notice refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to West Pennine Trucks Limited as the controller.

## THE PERSONAL INFORMATION WE COLLECT

We collect personal information from you and from other sources. Any information we collect from you is provided on a voluntary basis, and you are under no statutory or contractual obligation to provide us with your personal information; however, we require at least the information above in order for us to deal with you as a prospective customer or customer (or a representative of the same) in an efficient and effective manner.

If we do not collect this information we will be unable to process orders and purchases or provide you or your organisation with products or services and may be unable to communicate with you effectively. Where the law allows, we may combine information we receive from other sources with information you give to us and information we collect about you.

The personal information we collect from you is as follows:

### 1. Customer Account

- 1.1. When you have a sales interaction with us for the first time we will likely create a customer account on our system. A customer account is similar to an address book entry and includes your Contact Information ("**Customer Account**").
- 1.2. We link to your Customer Account, details of your interactions with us and your Vehicle Identification Information (where you have purchased a vehicle from us, we have worked on the vehicle (no matter the manufacturer) or you have otherwise provided us with your vehicle details).
- 1.3. We may add personal information to your Customer Account (or create a Customer Account where you do not already have one) in the following circumstances:
  - When you purchase a vehicle, parts, service or merchandise from us in one of our depots, over the phone or online, we will record details of your invoices and payments against your Customer Account.
  - When you enter into a service agreement, a repair and maintenance agreement or a warranty agreement with us.
  - When you part exchange a vehicle.



- When you enter into a contract with us for Monitor, Connect, Driver Training, Driver Coaching or other Optimise Services product package.
- When you request a credit account with us, or any changes are applied to your credit account.

## **2. Customer Relations Account**

2.1. When we create a Customer Account, we will also create a Customer Relations Account which will record details of our interactions with you. A Customer Relations Account may include:

- Your Contact Information.
- Details of your contact with us, including queries, requests, complaints and warranty claims.
- We will record details of your interactions with us (and ours with you) through our contact centres, depots, central services, online or by using one of our apps. For example, we collect notes from our conversations with you, details of any complaints or warranty claims you make and any feedback you have given.

2.2. We may create a Customer Relations Account, or add information to your existing Customer Relations Account in the following circumstances:

- When you ask us to email you information about a product or service.
- When you engage with us on social media we may collect your social media username to help us respond to your comments, queries or feedback.
- When you download or install one of our apps.
- When you enter prize draws or competitions we will use your information to administer the prize draw or competitions which you enter. We may also use this information to market to you if you represent a company.
- When you book any kind of appointment with us or book to attend an event, for example a test drive or a customer track day event.
- When you choose to complete any surveys we may send to you.

## **3. Vehicle Generated Information**

We may receive your Vehicle Generated Information from Scania CV AB, a parent company of Scania (Great Britain) Limited. This information will usually not include your offline identity. However, in certain circumstances, this Vehicle Generated Information may amount to personal data, for example, if you are an owner driver, as it can be linked to you.

## **4. Other personal information**

4.1. We may also collect your information in certain other circumstances:

- When you make a credit or debit card purchase with us we will process your payment card information. We do not hold your long card number. It is used by our payment processing partner only in the moment the payment is processed. We ensure your payment card information is secured to Payment Card Industry Data Security Standards. We retain for our records your payment method, card type and the last 4 digits of your payment card.



- If you wish to drive one of our vehicles (courtesy cars, rental vehicles, driver training vehicles etc), we may ask you for a copy of your driver's licence or your DVLA code. This will include details of your full name, address and date of birth, and in the case of a photocard licence, your facial image. Your personal information will not be shared unless we are notified of an accident or incident whilst you were driving the vehicle, in which case, your personal information may be shared with the police, our insurers and legal advisors.
- When you fill in any forms, for example, if an accident happens on any of our premises, we may collect your personal information.
- When a third party provides us with your personal information, for example, businesses within the Scania Group may provide us with your personal information. Where your personal information is received by us and you have not received a copy of this Privacy Notice, we will contact you to inform you that we have received your personal information, what personal information we have received and how we may use that personal information.
- From publicly available sources (such as the Vehicle and Operator Services Agency) when you have given your consent to share personal information or where the personal information is made public.
- When you use our car parks and premises we may have CCTV systems operated for our security and yours. These systems may record your image and number plate during your visit.

4.2 When we communicate with you, we process any personal information you give to us in voicemails, emails, correspondence and other work- related communications and computer logs which may be created, stored or transmitted by us using our computer or communications equipment.

## 5. **Anonymised and Technical Information**

- 5.1. We may automatically collect information about your use of our website, such as the number and duration of visits to the website and details of which particular pages have been visited. We will anonymise this information so that it is not attributable to you ("**Anonymised Information**").
- 5.2 We also automatically collect technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform as well as cookie, tracking pixel and beacon identification information. Please see our [Cookie page](#) for further information ("**Technical Information**").
- 5.3 We use any collected Technical Information and Anonymised Information to analyse how our website is functioning and how it is used by users, for insight purposes and to help us maintain and improve our website on an ongoing basis.



## HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose and complies with data protection laws.

Data protection law requires us to have a valid reason to process your personal information for each of the different purposes for which we use that information. The law refers to each reason as a 'lawful basis'.

The purposes for which we use your personal information and the lawful basis on which we rely to process it for each purpose is as follows:

### **Where you have provided CONSENT**

In specific situations, we will seek your consent to collect and process your personal information. When we seek your consent, we will make clear to you how we would like to use your personal information so that you can make an informed decision about whether to allow us to collect and use your personal information. We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- to send to you electronic marketing communications including by email and SMS, where you ticked a box or otherwise opted-in to receive such communications;
- to send to you electronic marketing communications including by email and SMS, where you ticked a box or otherwise opted-in to receive such communications;
- to use personal information collected from non-essential cookies used on our website (see our Cookie page for more information for detailed information regarding our purpose of use);
- to use your personal information collected if you attend one of our events to cater for dietary requirements or disability access; and
- where we ask for your permission within one of our apps, to use your location information to make features of our app more convenient or our services or content more relevant to you;
- to use your personal information if we need to book travel arrangements on your behalf to attend any of our events.

We may from time to time also rely on consent to use your name and image for publicity purposes. If you do not agree, the photographs will be deleted or the image will be modified so you will be unidentifiable.

You may withdraw your consent for us to use your information in any of these ways at any time.

### **Where necessary to comply with our LEGAL OBLIGATIONS**

We will use your personal information to comply with our legal obligations including as follows:

- to respond or assist the public authorities or the police and other criminal investigation bodies where required by law;
- to keep a record relating to the exercise of any of your rights relating to our processing of your personal information;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists to be able to comply with your request);



- to anonymise or delete your personal information when it is no longer required for the purposes described in this Privacy Notice;
- to remember your cookie preferences (for which we use a cookies);
- to comply with court orders or other notices where failure to do so would result in us breaking the law; and
- to handle and resolve any complaints we receive relating to our processing of your personal information as described in this Privacy Notice; and
- to comply with our health and safety obligations, primarily when you are visiting any of our premises.

#### **Where it is in your VITAL INTERESTS**

We will use your personal information where we consider the processing of your personal information will prevent or reduce any potential serious physical harm to you. For example, if we need to communicate an announcement about a high impact product safety issue to you.

#### **Where it is in ours, or someone else's, LEGITIMATE INTEREST**

In certain circumstances we may collect and use your personal information where it is reasonable for us to do so in the **legitimate interests** of our business or another person and where we consider that doing so will not materially impact your rights, freedom or interests. This means we may use your personal information in a reasonable way (that you might expect) but only where we consider this will not cause you any excessive or unnecessary risk. We process your personal information for the following purposes based on the following legitimate interests:

##### **Processing necessary for us to transact and deliver our products and services to our corporate customers, and provide customer support**

- to provide materials or information you request from us, including any specific marketing information that you request;
- to process and deliver orders for purchases and services for our corporate customers;
- to send to you information regarding the service requirements of your vehicle, or other operational communications;
- to provide support to you in relation to your purchases and services or repairs that you request;
- to conduct a credit check where you have requested a credit account. Where you have an existing credit account we may use your personal information to periodically review the credit amount we extend to you. We do this to ensure the affordability of extended credit.

##### **Processing necessary for us to promote our business and measure the reach and effectiveness of our campaigns**

- to contact you with marketing information by post or by phone (if you are not registered with the Telephone Preference Service (including the Corporate Telephone Preference Service, where relevant);
- to contact you with marketing information by email and SMS (if you are a corporate customer or where you were presented with an opportunity to opt-out of such contact but did not do so);
- to tailor communications (including recommendations) to you based on your location, interests, and previous bookings and to personalise our services, products and content for you;



- to communicate targeted advertising to you in social media. You may receive advertising based on information about you that we have provided to a social media platform, or allowed it to collect using cookies on our website (or a combination of the two). For some of our marketing campaigns, we may use this information to exclude you from receiving advertising if we believe it will not be relevant to you. You may also receive advertising because, at our request, the platform has identified you as falling within a group whose attributes we have selected or a group that has similar attributes to the individuals whose details it has received from us (or a combination of the two);
- for analysis and insight conducted to inform our marketing and business strategies, and to enhance your user experience; and
- to identify and record when you have received, opened or engaged with our website and/or our electronic communications (please see our [Cookie page](#) for more information);

#### Processing necessary for us to respond to changing market conditions and the needs of our users

- to analyse, evaluate and improve our website and our products and services so that your visit and use of the website and products and services are more useful and provide a better experience (we will generally use data aggregated across many people so that it does not identify you personally except where it is necessary to use your personal information without aggregation to achieve these purposes);
- to undertake market analysis and research (including contacting you with user or customer surveys) so that we can better understand your use of our website and our products; and
- to use Vehicle Generated Information to evaluate driving style, identify your servicing needs for the purposes of flexible maintenance, your location in the event of breakdown, and/or to engage with fleet management through the Connected Services portal.

#### Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

- to maintain the security of and protect our staff, customers, users, and property, including to communicate low impact product safety announcements to you;
- to process payments made by you or the organisation for whom you work, and share your personal information with payment processors for this purpose;
- to administer our website, and for internal operations, including troubleshooting, testing, statistical purposes;
- for the purposes of audits of our business or systems, whether conducted internally or by external auditors;
- for insurance purposes, including to exercise our rights or fulfil our obligations under the terms of our insurance policies;
- for cookie that are essential for our website to function properly, other than those required by law (please see our [Cookie page](#) for more information);
- for the detection and prevention of fraud and other criminal activities;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- for the purposes of corporate restructure or reorganisation or sale of our business or assets;
- for efficiency, accuracy or other improvements of our databases and systems, for example, by combining or migrating systems or data or consolidating records we hold about you;
- to enforce or protect our contractual or other legal rights or to establish, evidence, bring or defend legal proceedings or to defend any regulatory or other enforcement action, investigation or enquiry by a public authority or body including law enforcement;
- to inform you of updates to our terms and conditions and policies;
- for other general administration including managing any reports you make, your queries, complaints, or claims, and to send service messages to you; and
- to contact you when your local authorised dealer closes, moves premises or is no longer an authorised dealer.



**Where necessary for us to carry out PRE-CONTRACT STEPS you have requested or for the performance of our CONTRACT**

We may need your personal information to comply with the contractual obligations under an agreement with you in your capacity as an individual, including as a sole trader (but not on behalf of a corporate entity). We may also require your personal information where we take steps towards entering into a contract with you where you have requested these.

If you are a non-corporate customer (e.g. an individual customer or a sole trader), we will use your personal information where this is necessary for us to perform our contract with you or to carry out any pre-contract steps you've asked us to so that you can enter into that contract, for the following purposes:

- to provide fulfil orders and deliver vehicles to you;
- to respond to your product queries and to book and deliver test drives;
- to provide customer support to you including by responding to your customer service requests and enquiries; and
- to administer any prize draws or other competitions that we run.

**WHO WE RECEIVE YOUR PERSONAL INFORMATION FROM**

We obtain certain personal information about you from other sources (including those outside of our business) which may include other companies in our corporate group, Scania (Great Britain) Limited and its corporate group and the Scania Dealer Network authorised dealers, public authorities, online sources and certain data providers. The sources from which we may receive your personal information is as follows:

Source of personal information	Types of personal information we receive
Scania CV AB, parent company of Scania (Great Britain) Limited (see its private statement at <a href="https://www.scania.com/content/dam/group/home/scania-privacy-statement/scania-privacy-statement-eng-1.pdf">https://www.scania.com/content/dam/group/home/scania-privacy-statement/scania-privacy-statement-eng-1.pdf</a> )	Contact Information, Vehicle Identification Information and Vehicle Generated Information.  Contact preferences, purchases and transactions, survey responses and system usage information.  Organisational data (such as company name, country, company address and phone number), profession, market location.  Driving behaviour, such as driving patterns, geo-location, operating hours and preference settings.  Device data including IP number, MAC address, IT-system and user ID.
Scania Finance Great Britain Limited trading as Scania Financial Services, a group company of Scania (Great Britain) Limited (see its privacy statement at <a href="https://www.scania.com/content/dam/www/market/uk-finance/legal/privacy-notice/scania-financial-services-privacy-notice-2022.pdf">https://www.scania.com/content/dam/www/market/uk-finance/legal/privacy-notice/scania-financial-services-privacy-notice-2022.pdf</a> )	Contact Information.  Organisational data (such as company name, country, company address and phone number).
Scania Dealer Network (see next section for a full list of companies)	Contact Information and Vehicle Identification Information.  Customer type, employer, date of birth, gender (on driving licence), licence type, licence number, nationality, contractual start/end date, marketing preferences, customer queries, requests and complaints, warranty claims, customer feedback,





	social-media username, appointment bookings, test-drive bookings, survey responses.  Vehicle status, make, model, description, service history, mileage, contracted mileage, CAP ID code.
Business Intelligence Services	Financial data (such as company credit reports, company financials, director and shareholder details, corporate ownership, and official registry data)
Police and other public authorities including the Vehicle and Operator Services Agency	Contact Information and Vehicle Identification Information
Social media providers	Social media activity (such as tags, comments, replies, direct messages)



## WHO WE SHARE YOUR INFORMATION WITH

1. We understand that your privacy is important and that you trust us to look after your personal information. We will never sell your personal information.
2. We may share your personal information with carefully chosen third parties that we trust to carry out services on our behalf.
3. When personal information is shared with a third party, we will apply a policy to help keep your personal information safe:
  - We will provide only the personal information they need to perform the services for us.
  - They may only use your personal information for the exact purposes we specify in our contract with them.
  - We will work closely with them to ensure that your privacy is respected and protected at all times.
  - If we stop using their services, any of your personal information held by them will either be deleted by them or rendered anonymous.
4. We will not share your personal information without good reason. Below are some of the categories of third parties who we may share your personal information with:

### i. **Group Companies**

We may share your personal information with other companies within the Scania Group including Scania (Great Britain Ltd) and its parent company Scania CV AB in addition to its financial services group company, Scania Finance Great Britain Limited. This may be to offer you services that we cannot, for example, vehicle finance options, or to provide vehicle recovery services such as Scania Assistance. We may also share your marketing preferences relating to our group companies with them if you provide these to us, together with related records regarding the time, date and method of collection of those preferences.

### ii. **Scania Dealer Network**

We may share your personal information within the Scania Dealer Network. The Scania Dealer Network consists of over 60 Scania Dealerships across the UK. Some of the dealerships belong to Scania (Great Britain) Limited and some of the dealerships belong to franchisees, operating according to Scania Dealer Operating Standards. Together we form the 'Scania Dealer Network'. Each corporate member of the Scania Dealer Network has access to your personal information held on the Customer Account and Customer Relations Account. This allows the UK network to operate as efficiently as possible to keep you moving, to assist you in the event of breakdown and to keep you up to date with your servicing requirements. The companies within the Scania Dealer Network (and links to their own privacy policies, where available) are:

Scania (Great Britain) Limited  
Haydock Commercial Vehicles Limited  
TruckEast Limited  
Keltruck Limited  
Graham (Commercials) Limited  
Road Trucks Limited  
Strata Commercials Limited  
Granco Limited  
S.J.Bargh Limited



### iii. Our Suppliers and Service Providers

We may share your personal information with our third-party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf ("Suppliers"). We set out in the table below a summary of the different types of Supplier that we engage:

Category	Industry	Sector	Location
Drivers	Services	Automotive	UK, EU
Credit Reference Agencies and related intermediaries. See the following notice for further details: <a href="https://www.experian.co.uk/legal/crain">https://www.experian.co.uk/legal/crain</a>	Financial Services	Credit Agencies	UK, EU
Marketing Agencies	Media	Advertising	UK, EU
Body Builders	Manufacturing	Automotive	UK, EU
Insurers	Financial Services	Insurance	UK, EU
IT Service Providers	personal information Technology	IT Software and Services	UK, EU, USA
Travel Companies (Events)	Consumer Services	Hotels, Airlines, Restaurants and Leisure	UK, EU, USA
Fuel Card Services	Financial Services	Consumer Finance	UK, EU
Survey Providers	Professional Services	Research and Consulting	UK, EU USA
Market Researchers	Professional Services	Research and Consulting	UK, EU
Driver Trainers	Services	Automotive	UK, EU
Institute of Advanced Motorists	Regulated body	Automotive	UK

### iv. Other third parties

We may also share your personal information:

- with social media platforms with whom we work;
- with any third party who is restructuring, selling or acquiring some or all of our business or assets or otherwise in the event of a merger, re-organisation or similar event
- if we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or request, including by the police, local authorities, HMRC, DVLA, VOSA, courts, tribunals, regulators or other public or enforcement bodies e.g. to detect or report a crime, to comply with our tax obligations, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our staff and customers.

## OUR USE OF SOCIAL MEDIA

1. We use a number of different social media platforms to communicate with you and to promote products and services. We process your personal information using these platforms in a variety of ways, as follows:



- a. Pages/accounts. We use your personal information when you post content or otherwise interact with us on our official pages and accounts on Facebook, Instagram and, LinkedIn and other social media platforms. We also use the Page Insights service for Facebook, Instagram and LinkedIn to view statistical information and reports regarding your interactions with the pages and accounts we administer on those platforms and their content. Where those interactions are recorded and form part of the information we access through these Page Insights services, we and the relevant platform are joint data controllers of the processing necessary to provide that service to us. Please see the beginning of this Privacy Notice for more information about our joint data controller arrangements.
- b. Cookies. We use cookies and similar technologies in our website to collect and send information to Meta about actions you take on our website and applications. In particular:
- Meta (who operates the Facebook and Instagram platforms) uses this information to provide services to us and also for further processing for its own business purposes. We and Meta are joint data controllers of the processing involved in collecting and sending your personal information to Meta using cookies and similar technologies as each of us has a business interest in Meta receiving this information. You can find out more about these technologies by visiting our [Cookie page](#). The services we receive from Meta that use this information are delivered to us through Meta Business Tools, which include Meta Pixel, Social Plugins and Website Custom Audiences. These tools allow us to target advertising to you within Meta's social media platforms by creating audiences based on your actions on our website and allow Meta to improve and optimise the targeting and delivery of our advertising campaigns for us.
- c. Our relationship with Meta and LinkedIn. As we are joint data controllers with these platforms for certain processing, we and each platform have:
- entered into agreements in which we have agreed each of our data protection responsibilities for the processing of your personal information described above;
  - agreed that we are responsible for providing to you the information in this privacy notice about our relationship with each platform; and
  - agreed that each platform is responsible for responding to you when you exercise your rights under data protection law in relation to that platform's processing of your personal information as a joint data controller.

Meta and LinkedIn also process, as our processor, contact information that we submit for the purposes of matching, online targeting, measurement, reporting and analytics purposes. These services include the processing these platforms carry out when they display our advertisements to you in your news feed at our request after matching contact details for you that we have uploaded to the social media platforms they operate. These advertisements may include forms through which we collect contact information you give to us.

- d. Further information. The Meta company that is a joint data controller of your personal information is Meta Platforms, Inc., 1601 Willow Road, Menlo Park, CA 94025, USA. The LinkedIn company that is a joint data controller of your personal information is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland For further information regarding these platforms and their use of your personal information, please see:
- Meta's [Controller Addendum for Page Insights](#) and [UK Controller Addendum for Business Tools](#), and LinkedIn's [Page Insights Joint Controller Addendum](#), which include information which include information regarding how our and these platforms' responsibilities to you are allocated as controllers of your personal information;



- Meta's Privacy Center including its Privacy Policy at <https://www.facebook.com/privacy> and LinkedIn's [Privacy Policy](#) which include details of the 'lawful bases' on which each platform relies to process your personal information, together with details regarding your data protection rights
- Meta's [help pages](#) regarding its [Page Insights](#) and Business Tools and its [terms and conditions](#) relating to those tools
- LinkedIn's [help pages](#) regarding its [Page Insights](#) and its [terms and conditions](#) relating to its advertising services, including [LinkedIn Insight Tag](#).

## HOW LONG WE KEEP YOUR INFORMATION

1. Whenever we collect or process your personal information, we'll only keep it for as long as is necessary for the purpose for which it was collected and in connection with any potential or actual claims.
2. At the end of that retention period, your personal information will either be deleted completely or anonymised. We may use your data in an anonymised way (so you cannot be identified and the information cannot be linked to you) for statistical analysis and business planning.
3. We will usually hold documentation for 7 years after our contract with you terminates. This is because the law allows for 6 years to bring a claim in contract law and we allow an additional 12 months for the claim to be served and reviewed. The only exceptions to the period mentioned above are where:
  - a. you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
  - b. you exercise your right to require us to retain your personal information for a period longer than our stated retention period;
  - c. we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible;
  - d. we may need to retain your personal information for a longer period to allow us to contact you in the event of any latent product safety issue;
  - e. we archive your personal information, in which case we will delete it in accordance with our routine deletion cycle based on good industry practice;

in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period, or we are reasonably requested to do so by law enforcement authorities.

## WHERE WE HOLD YOUR INFORMATION

1. There may be some instances where your information is processed or stored outside of the UK. Those countries may not have similar data protection laws to the UK and so may not protect the use of your personal information to the same standard.



2. In those instances, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Notice. These steps include imposing contractual obligations on the recipient of your personal information using standard clauses issued by the UK Information Commissioner's Office (or other relevant body) and relying on decisions in the form of regulations issued by the relevant UK Secretary of State (or other relevant person) declaring that a recipient or country is adequately protective of personal information to a degree that allows us to safely transfer your personal information to that recipient or country. This includes any international frameworks that allow recipients to certify that they can receive your personal information safely and process it in a manner that is protected to an equivalent standard as that under UK law.
3. Please contact us using the details at the end of this Privacy Notice for more information about the protections that we put in place and to obtain a copy of the relevant documents.
4. If you access our website whilst you are outside the UK, your information may be transferred outside the UK in order to use the services available through our website.

## **HOW WE KEEP YOUR INFORMATION SAFE**

1. We, the companies within the West Pennine, Scania Group and the Scania Dealer Network all use technical and organisational security measures to protect the personal information supplied by you and managed by us against manipulation, loss, destruction, and access by third parties. Our security measures are continually improved in line with technological developments.
2. 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 personal information whilst in transit to our website and any transmission is at your own risk.
3. Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping this password confidential. We ask you not to use the same password as on other accounts and not to share your password with anyone.

## **USE OF 'COOKIES'**

1. 'Cookies' are small pieces of information sent to your electronic device and stored on its hard drive to allow our website to recognise you when you visit it.
2. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.
3. If you are using our website, it is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our [Cookie](#) page.



## **LINKS TO OTHER WEBSITES**

1. Our website may contain links to other websites run by other organisations which we do not control. This policy does not apply to those other websites and apps, so we encourage you to read their privacy statements. We are not responsible for the privacy policies and practices of other websites and apps (even if you access them using links that we provide) and we provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.
2. In addition, if you linked to our website from a third-party website, we are not responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## **WHAT ARE MY RIGHTS OVER MY INFORMATION?**

1. You have several rights afforded to you under data protection laws. You have the right to:
  - request access to the personal information we hold about you, free of charge in most cases.
  - ask for the correction of your personal information when it is incorrect, out of date or incomplete.
  - be 'forgotten' and that we delete your personal information where we no longer need to process it.
  - request that we stop using your personal information in a particular way.
  - request that we stop using your personal information for direct marketing.
  - withdraw consent that you have previously provided and we must stop using your personal information for that purpose.
  - object to any processing that we undertake on the grounds of legitimate interest.
  - request that we transfer your personal information to another 'controller' (e.g. an alternative service provider).
2. You have the right to request a copy of the personal information we hold. Where any personal information we hold is inaccurate, you can request that it is changed. To ask for your personal information, please contact [GDPR@westpenninetrucks.com](mailto:GDPR@westpenninetrucks.com). To ask for your personal information to be amended, please contact your local depot or contracts manager.
3. You may ask that we delete your personal information and we must do so where we no longer have a reason for holding your personal information.
4. Whenever you have given us your consent to use your personal information, you have the right to change your mind at any time and withdraw that consent. We must then delete your personal information if we have no other reason for holding your personal information. Any use we made of your personal information before you withdrew your consent will be lawful.
5. You have the right to request that we temporarily stop using your personal information in a certain way. This right applies where:
  - you think the personal information we hold is inaccurate.
  - you think we are processing your personal information illegally.



- we no longer require your personal information but you may require it for legal reasons.
  - you have objected to us processing your personal information (see below) and you await a response from us.
6. Where we are processing your personal information on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal information.
  7. You have the right not to be subject to a solely automated decision that has a legal or other significant impact on you. We do not envisage making any such decisions about you, however we will update this Privacy Notice and inform you if this position changes.
  8. You have the right to stop the use of your personal information for direct marketing activity through all channels, or selected channels. We must always comply with your request. See section: How to stop us direct marketing to you.
  9. If we choose not to action any request from you, we will explain to you the reasons for our refusal.
  10. We may ask you to provide evidence of your identity before we process any request. This is to ensure the security of your personal information.





## HOW TO STOP US FROM DIRECT MARKETING TO YOU

1. You can stop receiving marketing emails from us at any time by clicking the 'unsubscribe' link at the bottom of our emails.
2. We will stop all direct marketing to you if you email your request to [GDPR@westpenninetrucks.com](mailto:GDPR@westpenninetrucks.com)
3. Please note that you may continue to receive communications for a short period after changing your preferences whilst we process your request.

## CONTACTING THE REGULATOR

We encourage you to get in touch with us directly in the event of any query or complaint at [GDPR@westpenninetrucks.com](mailto:GDPR@westpenninetrucks.com), or by calling 0161 653 9700 and asking for the Legal, Risk and Compliance department, and we will do all we can to resolve any issue you may have. However, if you feel that your personal information has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal information, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113.

## CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice may change. If it does, we will post an updated version on our website. If the changes are material, we may contact you by email to let you know. If you do not agree with the changes, you must notify us immediately at [GDPR@westpenninetrucks.com](mailto:GDPR@westpenninetrucks.com) and stop using our services. Changes will take effect 7 days after the updated Privacy Notice is uploaded. We recommend that you review this notice from time to time on our website.

## CONTACT AND LEGAL INFORMATION

If you have any questions, suggestions or complaints about the processing of your personal information or wish to contact us to amend/update your marketing preferences, please contact us using the details below:

West Pennine Trucks Limited  
Unit 32  
Stakehill Industrial Estate  
Middleton  
Manchester  
M24 2RW

Or call 0161 653 9700 and ask for the Legal, Risk and Compliance department.  
Email: [GDPR@westpenninetrucks.com](mailto:GDPR@westpenninetrucks.com)

West Pennine trucks Limited is a limited liability company incorporated in England and Wales under company number 02665341 and whose registered office address is Unit 32, Stakehill Industrial Estate, Middleton, Manchester M24 2RW.