# Data Privacy Policy

This is the website privacy & cookies policy for the Topline Tractamotors. Topline Tractamotors takes your privacy seriously and are fully committed to handling the information we collect from you in a secure and responsible manner and adheres to the guidelines under the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018.

Any questions relating to this privacy policy should be sent to: <u>customerservice@tractamotors.ie</u>

Please read this privacy policy, which explains how we use your personal information, in particular:

- What information is collected from you through our trading website
- How the information is used and consent
- With whom the information may be shared
- How you can correct any inaccuracies in the information

#### GENERAL

When you register with any of the Group websites you may be asked for the following details:

- Name
- Address
- E-mail address
- Contact telephone number
- Further product information regarding sales and duty of care
- We will then keep your details safely and will not sell or rent your details to third parties.

We will only share your information in the way described in this statement.

#### **USE OF YOUR DATA**

The Group may pass your data to our select number of finance partners if you request finance.

The Group may use your personal details to contact you about news and special offers that we think may be of interest to you as part of the contractual and consent process.

If you wish to subsequently amend your consent, please e-mail the Data Manager at: datamanager@tractamotors.ie

Please also use these contact details to let us know if you would like us to delete any information from your records and we will do so at any time.

# PERSONAL INFORMATION, COLLECTION, AND RETENTION

The use of our website/s will result in the organisation receiving information from you. This will be used in examples of warranty and maintenance or when making online product purchases.

The organisation requires this information to provide our online services in order to purchase products at our outlets. We will detail this information below.

To make an online purchase, warranty, and maintenance, we will require a Name, Address, Contact Number, and Product information.

As part of our duty of care, we may contact you with reference to warranty and maintenance reminders. The Group may use your personal information for general marketing purposes as part of the contractual or consent process.

If you subsequently wish to amend your consent on general marketing, warranty, and maintenance reminders then please request that by sending an email to <u>datamanager@tractamotors.ie</u> or a written request to:

*The Data Controller* Tractamotors Ltd Dublin Road Cavan H12 E4W6

#### THE DATA CONTROLLER

If you search through our product offers then we may store information on the products searched for and your postcode that is used to personalise the results that are returned to you.

Please be aware that your call(s) may be monitored or recorded for training purposes.

When you visit our store, we use CCTV to monitor our premises in this event your image and your vehicle registration can potentially be stored for a period of up to 4 weeks.

If you wish to obtain finance as part of the requirements of purchasing our products we will be required to collect further details for finance and credit search purposes. These are;

- Name
- Email
- Address
- Length of time at present address
- Previous Address (if you have been at your current address less than 3 years)
- Date of Birth
- Gender
- Full driving license
- Marital status
- Dependants

This information will be passed to the finance provider and recorded on their finance system. Your personal information will be stored on your order form, which may be retained for 7 years after which it will be deleted. Our data retention periods are reviewed on a regular basis and we will only hold your personal information as long as it deemed relevant for the required activity or as required for legal reasons or as stated in any relevant contract that we have in place with you.

# MARKETING

Topline Tractamotors may contact you with reference to our duty of care for safety, warranty and maintenance based compliance OR where there is a contractual reference for us to do so.

If you have agreed to receive marketing from us by form of consent you will have the option to select which form of marketing you would like to receive. You may choose to amend your consent to receive such marketing from us and you can do this by sending an email to datamanager@tractamotors.ie to change and remove the methods you wish to be contacted by.

If you have agreed to receive marketing from Topline Tractamotors we may inform you of new products and promotional events available from companies within our organisation.

# TRACKING

We track your movements on the website to analyse trends and public interest in our products and services, administer the site and gather information for aggregate use. The information we gather in this way is anonymous and is not linked to personal information from which you can be identified.

# SAFETY AND COMPLIANCE

For warranty, maintenance, and product safety requirements contacts will be made to our customers from the manufacturer or from Topline Tractamotors.

# DATA SECURITY

You should be aware that the transmission of information via the Internet is not completely secure although we will use our best endeavours to protect your personal data. We cannot guarantee the security of your data in transit.

After receiving your information Topline Tractamotors will use clear procedures and security features to try to prevent unauthorised access.

We will never ask you to email your bank details, usernames, passwords, or ask you through an email or text for personal banking information. If you suspect you have become a victim of fraud please report this instance to the-Gardai.

#### ACCESS TO INFORMATION

You may request a copy of your personal information that the company holds about you at no cost by completing a "Data subject access request form". If you wish to access or update your personal information please contact Topline Tractamotors by sending an email to datamanagertractamotors.ie or a written request for a form to:

Data Manager Tractamotors Ltd Dublin Road Cavan H12 E4W6

If you wish to remove any of the personal information the company holds please request this by email or writing to the above address to complete a "Right to be Forgotten Form". However, if personal information relates to any legal reasons it may be removed before being provided to you.

Both forms can be obtained by emailing the <u>datamanager@tractamotors.ie</u> or writing to the data manager

#### COOKIES

# WE USE COOKIES TO MAKE THIS WEBSITE AS USEFUL TO YOU AS POSSIBLE

Cookies are small text files that we put in your browser to track usage of our site (to improve and enhance it) but they do not tell us who you are. Absolutely no uniquely identifiable information is stored in any of our Cookies.

#### WHAT ARE COOKIES?

A cookie is a piece of data/text file that is placed in your computer's memory when you visit a website. The information the cookie contains is set by our website's server and, depending on the type of cookie, may be used each time you visit our website/s.

Cookies are widely used to make our website/s work, or work more efficiently for you, our guest, as well as to provide companies with information about traffic through the website.

Cookies are designed to remember things that you have done on a website in the past, which can include putting products in your basket, logging in, or clicking on links. This can save you time when you visit a website more than once.

Cookies can be used by our website/s in the following ways:

To remember your preferences.

To remember your password.

To find out what the website doesn't do well and make improvements to it in future.

Allow you to share pages with social networks like Facebook.

To make personalised product recommendations, based upon your previous times you've visited our website/s.

Make sure advertising on other websites is relevant to you.

They can also help us to see how many people are visiting our website and which pages are the most popular (see Google Analytics).

#### **ADVERTISING COOKIES**

Our website uses cookies/advertising IDs for the purpose of advertising. This enables us to show our advertisements to visitors who are interested in our products on partner websites, apps, and emails. Re-targeting technologies use your cookies or advertising IDs and display advertisements based on your past browsing behaviour.

Cookies are not dangerous. They are not computer programs and cannot be used to circulate viruses. They are not used to identify you personally.

#### **GOOGLE ANALYTICS**

This is a behavioural tracking service that shows us what pages people have visited, for how long and in what order. It also tells us whether people are using desktops or mobile devices to view the website, and other helpful information. This data helps us find out what can be improved on the website and how important it is.

#### WHAT COOKIES DO WE USE?

#### We use the following Cookies:

Strictly necessary Cookies. These are Cookies that are required for the operation of our website. They are necessary for the safety, security and integrity of the site. For example, they help support the structure of the pages that are displayed to you, help to improve navigation and allow you to return to pages you have previously visited. This type of Cookie only lasts for the duration of the time you are visiting the website. When you leave the website they are deleted automatically.

Performance Cookies or analytical Cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. The data is aggregated and anonymised, which means we cannot identify you as an individual.

Functionality Cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). These Cookies will remain on your device until you choose to clear it. If you choose to do this, you will need to enter your details each time you visit the site.

Targeting Cookies. These Cookies will collect information about your browsing habits and allow us to show you adverts while you are browsing our site and other sites on the internet. They are set by us or by carefully selected third parties. They help us to understand the performance of our marketing activities and improve the relevance of the adverts that you see.

Blocking or restricting Cookies. You can stop Cookies being used on your device by activating the setting on your browser that allows you to block the deployment of all or some Cookies. Please visit www.allaboutcookies.org to find out how. Please note, if you use your browser settings to block Cookies you may not be able to access all or parts of our site.

# LIST OF COOKIES

Here is a list of the main cookies we use, and what we use them for on our website/s.

Name

Purpose

Description

PHPSESSID

User session ID

Cookie generated by applications based on the PHP language. This is a general purpose identifier used to maintain user session variables. A good example is maintaining a logged-in status for a user between pages.

cb-enabled

Cookie consent alert

This cookie is associated with a free script which shows a cookie alert notice on a website. It is used to record when the user has dismissed the notice to prevent it re-appearing on return visits.

\_ga

Google Universal Analytics

This cookie name is associated with Google Universal Analytics. It is used to distinguish unique users by assigning a randomly generated number as a client identifier.

\_gid

**Google Universal Analytics** 

This cookie name is associated with Google Universal Analytics. This appears to be a new cookie and as of Spring 2017 no information is available from Google. It appears to store and update a unique value for each page visited.

\_gat\_UA-37170836-1

**Google Analytics** 

This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it relates to.

\_vwo\_uuid\_v2

Visual Website Optimiser

This cookie name is associated with the product Visual Website Optimiser. The tool helps site owners measure the performance of different versions of web pages.

\_\_unam

ShareThis

This cookie is usually associated with the ShareThis social sharing widget placed in a site to enable sharing of content across various social networks.

\_\_insp\_norec\_sess Disqus comment plugin A cookie used by the Disgus comment plugin (https://disgus.com/) \_\_insp\_nv Disqus comment plugin A cookie used by the Disgus comment plugin (https://disgus.com/) \_\_insp\_slim Disqus comment plugin A cookie used by the Disgus comment plugin (https://disgus.com/) \_\_\_insp\_targlpt Disgus comment plugin A cookie used by the Disgus comment plugin (https://disgus.com/) \_\_insp\_targlpu Disqus comment plugin A cookie used by the Disgus comment plugin (https://disgus.com/) \_\_insp\_wid Disqus comment plugin

A cookie used by the Disqus comment plugin (https://disqus.com/)

You can at any time refuse the use of cookies.

# **IP ADDRESSES**

The additional cookies that run during your session will collate information regarding your computer in the form of server logs including where available your IP addresses, operating system, browser types regarding your systems administration.

This is for the purpose of statistical data. Disabling cookies ensures that your IP address will not be recorded. You can update your cookie preferences in your browser settings. Please note that disabling cookies will ensure that your IP address will not be recorded.

Topline Tractamotors would request that the cookies are accepted, as they are used for:

Customisation of the website layout and content.

Recognition of when a user has visited and how many unique visits are received.

Remembering your preferences and settings.

Recognition of devices so the same information is not needed on every visits to the website. Identification of errors for resolution.

Identification of what is relevant whilst browsing the website.

Collation of statistical and anonymous information around the use of our digital services.

Effectiveness of our website and online message.

#### LINKS

The Websites associated with Topline Tractamotors may contain links to and from the websites of our partner networks and manufacturers.

In the event of you following these links, these websites will have their own privacy policies and Topline Tractamotors does not accept any responsibility or liability for these policies.

Topline Tractamotors would advise that you check these policies before you submit any personal information to these websites.

#### SOCIAL NETWORKS

The Websites associated with Topline Tractamotors may offer you opportunity to share or follow information about the business using third party social networking functionality; share this, like or follow buttons.

We offer this functionality in order to generate interest toward our website and services among members of your social networks.

You should be aware that sharing personal information within a social network may result in that information is being collected by the social network provider. This could result in that information becoming publicly available in internet search engine results.

We do not exercise or endorse controls, policies or practices on any third party social network that you may access through our websites.

Please read the privacy policy on any social network with which you may share information with.

# JURISDICTION - DATA STORAGE FOR USE IN THE EU, UK AND THIRD COUNTRIES

Topline Tractamotors store your data on secured servers inside the EU, UK and third countries (e.g. Isle of Man). Most of our partner networks are mainly based within the EU, UK and third countries. If any data is stored outside the EU, UK or third countries, it will be documented.

We have a clear data policy in place regarding the submission of your personal information. This will cover consent to transfer, storing or processing your personal information and data.

In the event of this instance Topline Tractamotors will take steps to ensure that the required security measures are followed to protect data as per our data security policy.

You can read about the EU e-Privacy Directive at <u>https://ec.europa.eu/info/law/law-topic/data-protection</u>

We may update our privacy policy from time to time, so would advise that you check it each time you visit the website.