

Data Privacy Notice

Shortis Group – Data Privacy Notice

The following data privacy notice explains the circumstances in which Shortis Group (KJ Shortis Ltd, EU Ltd, Fast-Fit Exhausts Ltd, Linco Plc, Motosave Ltd, Wilco Motor Spares Ltd) will collect personal data from you, why it is being collected, how we will use it and to whom we might disclose it if necessary.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

The data controller

Shortis Group is the data controller. This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

When dealing with Shortis Group, we will collect, store and use elements of your personal data. Shortis Group complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To provide the products and services you have requested from us
- To manage our employees
- As a matter of law or regulation
- To maintain our own accounts and records
- To inform you of marketing and news, (if you have opted-in to receive)

Website Cookies

When you access our websites, temporary data about your visit is stored and processed in a protocol file for a certain period of time via the use of cookies. This in turn helps us to provide you with a better experience, since we can evaluate the level of interest in the content of our website and tailor it accordingly. Should you wish to opt out of Google Analytic tracking across all websites please visit: <http://tools.google.com/dlpage/gaoptout>. Please note, you may find that some parts of the site will not function properly if you refuse cookies:

- IP address of the accessing computer/device
- Date, time and duration of your visit
- Name and URL of the accessed pages
- Identification data of the browser and operating system used
- Website from which the data was accessed
- Name of your internet access provider

The data listed above is only analysed for statistical purposes and for improving our internet presence, then it is deleted. We will not attempt to personally identify you from your IP address unless required to as a matter of law or regulation or in order to protect our rights, or other customers' rights.

Direct Marketing Communications

If you have opted-in to our direct marketing communications, we will use your information to tell you about products and services available from us which may be of interest to you. You have a

right to opt-out of our direct marketing communications at any time by following the unsubscribe instructions at the bottom of the communication

Links to other third party websites

This Data Privacy Notice only applies to Shortis Group and we are not responsible for, and have no control over, information that is submitted to or collected by third parties, such as those where our website may provide links and banner advertisements to third party sites. You are responsible for reviewing and abiding by the privacy policies of these third party sites to ensure they comply with the applicable data protection regulations.

How long will the data be stored for?

As a general rule, if you have dealings with Shortis Group, we will store the data for a period of seven years for compliance with our general legal obligations and for the exercise or defence of any legal claims. After that period data maybe Archived off and no longer processed. However we may retain information for longer where legitimate interest are of concern.

Under the GDPR, you have the 'the right to be forgotten' to prevent further processing, please confirm this in writing to our Data Protection Officer stating which company might be holding the data. Specific circumstances in which you can request the deletion or removal of personal data includes:

- Where the personal data is no longer required
- Where you withdraw consent
- When you object and there is no overriding legitimate interest
- Where the personal data was unlawfully processed
- Where the personal data has to be erased in order to comply with a legal obligation

In case a deletion is not possible due to legal, statutory or contractual retention periods, or if it requires disproportionate efforts, the data maybe blocked instead of deleted.

Sharing of data with other data controllers

We will only disclose your personal information outside Shortis Group when:

- you have given us your consent to do so
- it is necessary for the performance of an agreement of which you will be made aware
- in order to obtain professional advice (e.g. legal advice)
- we or others need to investigate or prevent crime (e.g. to fraud prevention agencies)
- the law permits or requires it
- regulatory or governmental body requests or requires it, even without your consent
- there is a duty to the public to reveal the information

We do not sell on your personal information to third parties.

Fraud Prevention

If you give us false or inaccurate information and fraud (in any form) is identified, details will be passed to the fraud prevention agencies. We and other organisations may also share, access and use this information to prevent fraud and money laundering, for example when:

- checking details on applications for credit and credit related or other facilities
- managing credit and credit related accounts or facilities
- recovering debt
- checking details of job applicants and employees
- In addition, law enforcement agencies may access and use this information.

Protecting your privacy

In order to protect the personal data collected from you by Shortis Group against accidental or deliberate manipulation, loss, destruction or the access of unauthorised persons, technical and organisational security measures are constantly improved as part of our technological development. In addition, our employees, subcontractors and other support staff are obligated to observe confidentiality and data privacy.

Wherever possible, we have tried to create a secure and reliable service in store and online customers. However, you recognise this is entirely at your own risk and we have no responsibility or liability for the security of personal information transmitted via the Internet.

We will monitor network traffic from time to time for the purposes of backup and problem solving and in order to prevent misuse of any of the services provided to you.

Breaches

If at any time we become aware that your data has been compromised, or that a breach of our systems and controls has occurred, which has an impact on the security of your data, we will notify the Information Commissioner's Office, and you, without undue delay.

Subject Access Requests

You have the right to request access to a copy of the personal information that we hold about you. This is also known as a 'Subject Access Request'. This information is provided to you free of charge, please contact our Data Protection Officer in writing, stating which company might be holding the data. However, we can refuse to respond or charge a 'reasonable fee' of £25 inc. VAT when a request is manifestly unfounded, excessive or repetitive.

Right to complain

If you have a complaint about any aspect of data protection or if you feel your privacy has been breached by us. Please contact our Data Protection Officer give as much details possible to help us investigate and resolve your concerns as quickly.

You have the right to complain to the supervisory authority, the Information Commissioner's Office (ICO) within three months of your last meaningful contact with us. You can call the ICO on 0303 123 1113 or by visiting their website: <https://ico.org.uk/>.

Changes to the Privacy Policy

Due to the further development of our procedures and websites, government regulations or the implementations of new technologies, this policy will be reviewed, and may change, from time to time. Shortis Group reserves the right to change this data protection information at any time with effect for the future. The revised policy will be posted to this page so that you are always aware of the information we collect, how we use it and under what circumstances we disclose it. We therefore recommend you read the current data protection information again from time to time.

Last updated: May 2018

Date of Next Review: Annually

If you have any questions about this privacy notice or how we use your personal data, please contact our Data Protection Officer:

Shortis Group, 186-200 Salhouse Road, Norwich, NR7 9AH Email: dpo@ShortisGroup.co.uk