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## PRIVACY NOTICE

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### BACKGROUND:

Di Lusso Club Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Us

Di Lusso Club Ltd

Limited Company. Registered in England under company number 12058579.

Registered and trading address: Longacres Farm, Newchapel Road, Lingfield RH7 6LE

VAT number: 426 4087 96

Data Protection Officer: Sally Millen

Email address: [info@dilussoclub.com](mailto:info@dilussoclub.com).

Telephone number: 0333 188 6586

Postal address: as above

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed if we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## 5. What Personal Data Do You Collect and How?

We may collect and hold some or all the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data **AND/OR** personal data relating to children.

Data Collected	How We Collect the Data
Contact information including name, address, telephone number and email address.	We will ask you to complete a data capture form.
If you opt for the services of using one of our courtesy cars, we will require your date of birth and details of any driving convictions.	We will require a copy of your driving licence. Together with consent to access your DVLA records.
Payment information including card details, bank account numbers.	We will obtain this information if you pay for our invoices via the telephone. We shall destroy your card details as soon as payment is received.

Details about your vehicles, including make, model, and registration number.	We will ask you to complete our data capture form.
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## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. We will generally process your personal data for contractual necessity in providing our products and services or for legitimate interests. We will use personal information for additional relevant purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. The law classifies this as the 'Legitimate Interests' condition for processing. Where we rely on it, the benefits being pursued are:

- To maintain our records for administrative purposes, including updating your personal details and to log your vehicle's service history. This allows us to issue you with an MOT or Service reminder and to honour our Warranty commitments on parts and work carried out on your vehicle.
- Complying with / supporting compliance with legal and regulatory requirements e.g., DVSA – MOT Testing and Record Keeping.
- CCTV systems may record your image, vehicle and registration when visiting our workshop or reception to ensure the security of customers, staff, property and premises.
- To monitor, analyse and improve our services and websites, including enhancing and personalising your customer service.
- Internal training purposes.
- To assist with queries, complaints and dispute resolution, including transmission of email enquiries coming via contact forms from traffic from the Di Lusso Club website.
- To assist authorities to prevent and detect crime, trading standards offences and fraud and money laundering.
- To improve data accuracy and completeness - when you register for our services you may supply us with additional information about yourself which we will use to improve our service offering.
- To ensure network and account security.
- Email tracking – to improve our communications with you.
- To monitor and record communications with you (such as telephone calls) for the purpose of quality assurance, training, fraud prevention and compliance.

With your permission and/or, where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If

we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. **How Long Will You Keep My Personal Data?**

We will only retain your personal information 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. To determine the appropriate retention period for personal data we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Under normal circumstances we will retain personal and vehicle information provided on servicing and invoicing records for a period of 10 years. This may assist with vehicle diagnostics and fault finding and will ensure that we can comply with our legal, contractual and warranty obligations.

We know how much data security matters to all our customers. We will treat your data with the utmost care and will take all appropriate steps to protect it. We secure access to all transactional areas of our website using 'https' technology. Access to your personal data is password-protected and sensitive data such as payment card information is secured by SSL encryption. We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

We may store some or all your personal data in countries outside of the UK. These are known as "third countries". We will take additional steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the [Information Commissioner's Office](#).

The security of your personal data is essential to us, and to protect your data, we take several important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## 9. **Do You Share My Personal Data?**

We use service providers to help us provide you with our services. Personal data may be transferred to these outsourced data processors, who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed. We only disclose your data to third parties for a limited number of reasons, these include: services delivery, communications, marketing, data management, technical support, evaluating our services and processing payments.

Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.

These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and to not disclose your personal data to third parties except as may be required by law, as permitted by us, or as stated in this Privacy Policy.

In appropriate circumstances we may disclose data to authorised bodies as required by law.

We may share your personal data with other companies related to us. Di Lusso Ltd is our sister company.

## 10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 2 weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Sally Millen:

Email address: [info@dilussoclub.com](mailto:info@dilussoclub.com).

Telephone number: 0333 188 6586.

Postal Address: Longacres Farm, Newchapel Road, Lingfield RH7 6LE.

## 12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website [www.dilusso.ltd](http://www.dilusso.ltd). This Privacy Notice was last updated on 3<sup>rd</sup> January 2023.

## 13. **Visitors to Di Lusso Club Website – Cookies, Google Analytics**

We use cookies to monitor how people use our website. Our first party cookies set directly by our website collect data on:

Google Analytics: to collect information about visitor behaviour on our websites. This analytics data is not tied to personally identifiable information. We do not collect or store your personal information (e.g., your name or address) so this information cannot be used to identify who you are.

Banner advertising: whether you have seen an advert and how long since you have seen it.

We collect these cookies as a legitimate interest to provide you with our online services and to analyse visitor behaviour on our websites.

Cookie information is held on your browser, and you can amend your browser settings at any time. However, please be aware that blocking or deleting all cookies will affect the usability of our websites.

Most device-based web browsers allow some control of most cookies through browser settings. Refer to your browser vendors to discover how to control what cookies your browser accepts and rejects.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <http://www.aboutcookies.org> or [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

We may collect your Internet Protocol (“IP”) address, which is a number assigned to your computer when you connect to the Internet. As part of the protocol of the Internet, web servers can identify your computer by its IP address. In addition, web servers may be able to identify the type of browser you are using. We may collect IP addresses for the purposes of internal security, website analysis, and system administration, including to assess the traffic on the website, and to maintain and make improvements to the website. We do not link IP addresses to personal information, but we can and will use IP addresses to identify a user when we feel it is necessary to ensure compliance with this Privacy Notice or our Terms and Conditions, to protect the website, users, or other visitors, or to comply with applicable laws.