

## Privacy Policy

**Overview** eDynamix provide hosted software solutions to the automotive industry, encompassing and embedded within the sales and service processes. Our aim is to improve dealer productivities and efficiencies and increase customer retention. As a result of the services we provide there is a requirement to process personal information about you.

eDynamix takes information security and data protection very seriously. We are committed to ensuring that your privacy is protected. This Privacy Policy describes how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

**Who we are** In respect of GDPR, eDynamix UK Ltd are “Data Controllers” when it comes to our employees, and any data where we decide the method and means of processing. For all other types of data eDynamix are considered a Data Processor which means our processing of your data is controlled by a third party that you are under a contract with

The Privacy Policy applies only where eDynamix UK Ltd is the Data Controller. It should be read in conjunction with any other privacy notice or fair processing notice that we may provide to you on specific occasions so that you are fully aware of how and why we are using your personal data. Where we are a Data Processor, the relevant Data Controller will be responsible for providing you with their own Privacy Notice.

Our registered office address is:

eDynamix UK Ltd  
Wansbeck Workspace  
Rotary Parkway  
Ashington  
Northumberland  
NE63 8QZ

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at [privacy@edynamix.com](mailto:privacy@edynamix.com)

**Collection of Personal Data** The information that we collect and store relating to you is primarily used to enable us to provide our services to you. The personal data we hold on you may include:

- General information such as your name, address, email address, contact numbers and vehicle registration numbers.
- Financial information such as bank details.

The data we hold will only be relevant to the service you have enquired about, the requirements of the service you have purchased, the contract that you have entered into with us and to manage the communication between us. By submitting these details to us you enable us to process your information to perform our obligation under a contract or to carry out the service you have entered efficiently and effectively.

Legal basis for processing personal data

eDynamix will always process your personal data fairly and lawfully and for the specified purpose of our services or with our contractual obligations with our customers with whom you may have a direct relationship or contract.

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. Some data may be shared with third parties; where this happens, this is also identified below.

eDynamix Module	Description	Types of Data	Lawful Basis	Retention Period	Data Shared
Service Plan Quote	When a Service Plan has been quoted however it has not been confirmed.	Name, address, email and phone details, vehicle information	Solicited – Contract Unsolicited – Either Consent or Legitimate Interests	Anonymised after 14 days of inactivity. Customer details deleted if not required for other reasons.	Internally only
Service Plan Contract	When a Service Plan has been confirmed with the customer.	Name, address, email and phone details, vehicle information & bank details	Contract	Anonymised 6 years after contractual obligations have been fulfilled. Customer details deleted if not required for other reasons.	Internally and any third parties whose products or services you may have purchased from us
Repair Plan Contract	When a Repair Plan has been confirmed with the customer.	Name, address, email and phone details, vehicle information & bank details	Contract	Anonymised 6 years after contractual obligations have been fulfilled. Customer details deleted if not required for other reasons.	Internally and any third parties whose products or services you may have purchased from us

eDynamix Module	Description	Types of Data	Lawful Basis	Retention Period	Data Shared
Finance Plan Contract	When a Finance Plan has been confirmed with the customer.	Name, address, email and phone details, vehicle information & bank details	Contract	Anonymised 6 years after contractual obligations have been fulfilled. Customer details deleted if not required for other reasons.	Internally and any third parties whose products or services you may have purchased from us
Online Service Plan Quote	When a Service Plan has been quoted however it has not been confirmed.	Name, address, email and phone details, vehicle information	Contract	Anonymised after 14 days of inactivity. Customer details deleted if not required for other reasons.	Internally only
iVHC	Vehicle health check system for all vehicles that enter a workshop.	Name, address, email and phone details, vehicle information	Contract	Vehicle information will be kept indefinitely however personal data will be anonymised after 3 years of inactivity (last visit or record creation, whichever is the most recent). With an exception with red work and recalls – safety related information will not be erased.	Internally and any third parties whose products or services you may have purchased from us
Follow Up	Remind customers of annual service obligations and work identified from previous iVHC in a timely manner.	Name, address, email and phone details, vehicle information	Consent or Legitimate Interests	Vehicle information will be kept indefinitely however personal data will be anonymised after 3 years of inactivity (last visit or record creation, whichever is the most recent). With an exception with red work and recalls – safety related information will not be erased.	Internally and any third parties whose products or services you may have purchased from us

eDynamix Module	Description	Types of Data	Lawful Basis	Retention Period	Data Shared
Follow Up Questionnaires (Survey)	Short online questionnaire to gain insight into a customer's visit to the dealership.	Name, address, email and phone details, vehicle information	Consent or Legitimate Interests	Hold information for 3 years after this customer details will be anonymised.	Internally only
Courtesy Car	When booking a service, a customer can book a courtesy vehicle.	Name, address, email and phone details, vehicle information	Contract	Hold information for 3 years after this customer details will be anonymised.	Internally only
Online Bookings	Allows customers to book into the dealership at any time of day or night at a date and time to suit their requirements.	Name, address, email and phone details, vehicle information	Contract	Hold information for 3 years after this customer details will be anonymised.	Internally only
Video1st	Personalised videos and photographs delivered to the customer via email and SMS.	Name, email and phone contact details,	Contract	Hold information for 3 years after this customer details will be anonymised.	Internally only
Sales Desk	Enquiries Appointments Sales	Name, address, email and phone contact details, vehicle information	Solicited – Contract Unsolicited – Either Consent or Legitimate Interests	Enquiries and Appointments - will hold information for 3 years after this customer details will be anonymised. Sales - will hold information for 5 years after this customer details will be anonymised.	Internally only

eDynamix Module	Description	Type of Data	Lawful Basis	Retention Period	Data Shared
iConsent	Capture of customer consent preferences for marketing purposes.	Name, address, email and phone contact details, vehicle information	Contract	Consent is held separately from customer records and cannot be used to identify and individual	Internally only
GDPR Daily Cleanse	Allows dealers to compare customer data with the consent database en masse.	Name, address, email and phone contact details, vehicle information	Solicited – Contract Unsolicited – Either Consent or Legitimate Interests	Consent is held separately from customer records and cannot be used to identify and individual	Internally only
System User Retention	Users of the eDynamix system who are not the end customer (employees of dealers, OEMs, etc)	Name and email	Contract	Indefinitely until such time as either the user or party with sufficient authority indicates the user’s personal information should be removed from the system.	Internally only

The legal basis which we rely on

**Consent**

For email marketing we will request your consent except where you are an existing customer or have requested information from us. We will usually request your consent in form of an opt-in tick box, or when you submit an email address expressly for the reason of receiving our marketing communications. We will always make it clear what your data will be used for and provide a link to our privacy policy. You can change your mind at any time by contacting us.

**Contract**

Processing of your personal data is necessary for us to administer the pre-contract and contractual relationship between ourselves, clients and customers in connection with the performance of the contract.

### Legitimate interests

Our legitimate interests include: communicating with our business customers to keep them informed about our products and services; understanding our customers; developing our business, products and services; informing our marketing strategy; keeping our website updated and relevant; the provision of internal administration and IT services, network security and fraud prevention; to comply with our legal obligations; processing in the context of a business re-organisation or group restructure; and promoting best practice, in all cases where your interests and fundamental rights do not override those interests.

### Marketing

We may use your personal data to form a view on what we think our business customers may want or need, or what may be of interest to them and in doing so we will only send information that is deemed relevant to their use of our products and services. This is necessary for our legitimate interests in growing and developing our business including our products and services. Customers will receive marketing communications from us if they have requested information from us or purchased services from us and, in each case, have not opted out of receiving that marketing. We will however ask for express consent before we share personal data with any third party for marketing purposes. You can ask us to stop sending marketing communications at any time by contacting us.

### Sharing personal data

Where applicable we may disclose your personal information to our subsidiaries to help us deliver a products or services you have enquired about or entered into a contract with us or the data controllers. eDynamix will only share personal information with third parties print management, business messaging service and business payment automation technology where we inform customers of forthcoming services, SMS reminders of services and to automate the collection of monies owed. The third-party suppliers have had the necessary security checks and due diligence completed to ensure that your data is handled securely once we have passed it onto the third party. Some third parties maybe based outside the European Economic Area (EEA) however, we always comply with our obligations under the Data Protections Legislation before sending your personal data to such countries, to ensure sufficient protections are in place to safeguard your personal data. Please contact us if you require further information about the specific mechanism used by us when transferring your personal data outside of the EEA.

### Storage of personal data

eDynamix UK Head Office is in the in the UK. We store your data on secure servers inside the European Economic Area (EEA), Derby, United Kingdom.

We use third party cloud providers to support us in providing our services. The servers powering and supporting the cloud infrastructure are located in secure data centres. The Data Centre is ISO 27001 accredited, they have all the appropriate technical and operational measures in place to ensure the security of personal data at all times.

The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and the transmission of such data is entirely at your own risk.

We will ensure that the personal data that we hold is relevant, not excessive and will not be held any longer than is necessary. Typical period of time we may hold onto your personal data is set out in the table above. However, there may be times where we need to hold onto certain

personal information longer. If this is the case, we will ensure that we have a legitimate processing ground for this.

#### Security measures

eDynamix information security management system has been certified to ISO/IEC 27001. Appropriate security controls are in place to try and protect personal data. Risk assessment, including assessing risks to the rights of data subjects is a main priority of the ISMS. However, you should be aware of many information security risks that exist and need to take appropriate steps to safeguard your own information. eDynamix accept no liability in respect of breaches that occur beyond our perimeter of control.

#### Your right as a data subject

As a data subject whose personal information we process, you have certain rights. If you wish to exercise any of these rights, please email [privacy@edynamix.com](mailto:privacy@edynamix.com) or use the information supplied in the Contact us section below.

##### The right to be informed

As data provider, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communication we may send you.

##### The right to access

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

##### The right to rectification

When you believe we hold inaccurate, incomplete or out of date information about you, you have the right to request that we amend your details accordingly. We may need to ask you some security questions for verification purposes and may require additional evidence relating to the change of details where necessary.

##### The right to erasure (the 'right to be forgotten')

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. We will take all reasonable steps to ensure erasure unless we are unable to comply with your request, for example if you are still in a contract with us.

#### The right to restrict processing

You have the right to request that the processing of your personal data is restricted. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested.
- b) Processing of the personal data is unlawful.
- c) We no longer need the personal data for processing, but the personal data is required for part of a legal process.
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

#### The right to data portability

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

#### The right to object

You have the right to object to our processing of your data where

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research; or
- Processing involves automated decision-making and profiling.

#### Different purposes

eDynamix may want to use your personal data for a different purpose than it was originally provided. If eDynamix want to do this, we will require your specific and informed consent. We may need to contact you via telephone, email or post in order to obtain your consent and if you choose not to opt in eDynamix will endeavour not to contact you again relating to this matter unless it is the normal course of business.

#### Other information we may collect

##### Internet Browser

Most websites collect certain analytical data to help them understand browsing habits of users. This may include collection of IP address, operating system type, geographic area of user, time of use, type of browser, pages visited and many more. This information is only used to monitor site usage levels and trends.

##### Cookies

Are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you use a website. Cookies are then sent back to the originating website on each subsequent visit, or any other website that recognises the cookie. Cookies are used to try and improve your browsing experience by remembering your preferences, letting you navigate more efficiently and can also help to ensure that any advert you see online are more relevant to you and your interests. Our cookies policy can be view on our website by visiting [edynamix.com](http://edynamix.com)



### Third party websites

Our websites may contain links to third party websites which are outside our control and are not covered by this privacy notice. For use of these websites please refer to the privacy policy on the third-party website.

Please note that the inclusion of a link on our websites does not imply our endorsement of that site or the policies that are contained within it.

### Compliance

The Directors of eDynamix UK have overall responsibility for this notice, and for reviewing the effectiveness of actions taken in response to breaches raised under this policy. This policy will be reviewed from a legal and operational perspective at least once a year.

### Reporting breaches

In order for eDynamix to deal with any breaches of this notice effectively, and should any employee, third party, client, website users and customers become aware of any potential or actual breach of this notice, please notify us at [privacy@edynamix.com](mailto:privacy@edynamix.com) so that we may fully investigate the breach and resolve any issues found.

### General

In respect of the GDPR, eDynamix are data controllers when it comes to our employees, and any data where we decide the method and means of processing. For all other types of data eDynamix are considered a data processor which means the processing of your data is controlled by a third party that you are under a contract with.

### Contact us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to [privacy@edynamix.com](mailto:privacy@edynamix.com)

Alternatively, you can contact us at our Head Office using the following postal address or telephone numbers:

eDynamix UK Ltd  
Wansbeck Workspace  
Rotary Parkway  
Ashington  
Northumberland  
NE63 8QZ

Telephone: +44 (0)845 413 0000

Our Compliance Department is open 9:00 am – 5:00 pm, Monday to Friday.

### Complaints

If you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you can escalate your complaint to the Information Commissioner's Office (ICO), <https://ico.org.uk/global/contact-us/>