



## **KENNINGTON CAR SALES LIMITED — PRIVACY POLICY**

### **REGULATORY STATEMENT & DATA CONTROLLER STATUS**

Kennington Car Sales Limited ("the Company", "we", "us", or "our") is completely committed to protecting and respecting your privacy, confidentiality, and personal data. This Privacy Policy outlines how we collect, process, manage, store, and protect your personal information. All data processing activities are executed in strict compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Financial Conduct Authority (FCA) compliance criteria.

For the purposes of applicable data protection legislation, **Kennington Car Sales Limited** operates as the primary **Data Controller** regarding the processing of your personal information.

### **SECTION 1: THE CATEGORIES OF PERSONAL DATA WE COLLECT**

To deliver a premium vehicle procurement experience, manage transactions securely, and facilitate automotive finance or warranty assets, we collect and process the following categories of data:

- **Identity Information:** Full legal names, titles, dates of birth, gender, and copies of official identification records (such as a UK driving licence or passport) used for identity verification and anti-money laundering (AML) compliance screening.
- **Contact Information:** Primary residential addresses, billing addresses, employment addresses, telephone contact numbers, and commercial digital email coordinates.
- **Transaction & Asset Records:** Vehicle purchase orders, sales invoices, part-exchange validation metrics, vehicle registration details (V5C validation data), HPI historical checks, service histories, booking files, and individual transaction histories.
- **Financial & Credit Assessment Metrics:** Income details, bank account numbers, sort codes, credit history scores, employment status matrices, and financial records compiled during digital vehicle credit applications.
- **Technical & Digital Telemetry Data:** IP addresses, browser tracking metadata, device profiles, and automated cookie tracking criteria processed during online vehicle reservations.
- **Security Records:** CCTV footage captured on-site at our Bletchley premises to ensure property protection and team safety.

### **SECTION 2: HOW WE COLLECT YOUR DATA**

We gather personal information directly from you through multiple operational touchpoints, including:

- **Direct Interactions:** When you contact our sales or aftersales divisions, complete vehicle reservation forms on our website, submit part-exchange appraisal details, or engage with our team in person at our Bletchley showroom.
- **Automated Technologies:** As you interact with our online platform, we automatically collect technical telemetry and browsing data via secure cookies and server logs.

- **Third-Party Sources:** We receive verification data from trusted third-party platforms, including automotive finance houses, credit reference bureaus, HPI vehicle history networks, and corporate lead-generation platforms.

### SECTION 3: LAWFUL BASES FOR PROCESSING DATA

In accordance with UK data protection legal standards, we process your personal data under the following strict lawful bases:

Lawful Basis	Applied Operational Purpose
<b>Performance of a Contract</b>	Executing your vehicle order, validating holding deposits, processing vehicle handovers, and managing part-exchange valuations.
<b>Legal Obligation</b>	Compiling financial sales records for HMRC tax compliance, processing anti-money laundering validations, and managing DVLA digital keeper registration updates.
<b>Legitimate Business Interests</b>	Managing ongoing aftersales care, facilitating mechanical diagnostic tracking, protecting dealership premises via CCTV monitoring, and resolving civil legal disputes.
<b>Consent</b>	Issuing automated vehicle updates, digital marketing alerts, or specific stock notifications where you have provided direct authorisation.

### SECTION 4: AUTHORISED THIRD-PARTY DATA SHARING

The Company respects your privacy and will never sell, rent, or distribute your personal data to mass-marketing platforms. To execute our master automotive retail operations, we share the minimum necessary information with specific authorised bodies:

- **Motor Finance Providers & Credit Brokers:** Where a client applies for vehicle credit, financial metrics are transmitted to dealer-authorised lenders and platforms to process credit eligibility checks and finalise underwriting contracts.
- **Warranty Underwriting Partners:** Your vehicle data, name, and contact details are passed directly to **Clear Cover Warranties** to activate and manage your extended component safety cover policies.
- **Statutory Public Bodies:** Data transmission to the DVLA for registration management, HMRC for margin scheme tax audits, or local law enforcement authorities when legally mandated.
- **Third-Party Data Processors:** Specialised service partners, including website developers, digital accounting software systems, card processing merchant acquiring platforms, and secure backup infrastructure hosts.

### SECTION 5: CREDIT REFERENCE CHECKING NOTICES

When you submit a request for an automotive finance quote or complete a digital vehicle credit application through our systems, your personal data is provided directly to credit reference agencies (CRAs) and finance underwriters. These organisations perform soft or hard credit checks to determine financial affordability. These checks may establish records on your public credit history file. Failure to provide complete financial information may prevent the authorisation of motor credit underwriting facilities.

### SECTION 6: DATA STORAGE TIMELINES & RETENTION PRACTICE

The Company retains customer personal information only for as long as necessary to fulfil the operational purposes for which it was originally collected, including satisfying any legal, compliance, accounting, or corporate reporting duties.

- **Financial Sales Records & Invoices:** Retained for a strict minimum period of **7 years** to satisfy statutory HMRC auditing requirements.
- **Finance Application Files & Contract Records:** Kept throughout the active duration of your automotive finance layout plus an additional 6 years to satisfy Financial Ombudsman Service (FOS) investigation windows.
- **General Sales Enquiries & Digital Contact Logs:** Retained for up to 2 years to facilitate routine aftersales tracking, customer service follow-ups, and inventory trend modelling.

## SECTION 7: TECHNICAL PROTECTION & PRIVACY SECURITY MEASURES

We deploy appropriate technical and organisational safety protocols to shield personal data against accidental loss, unauthorised destruction, malicious exposure, or unlawful alteration. Data entry forms on our website utilise encrypted Secure Sockets Layer (SSL) channels. Local database architecture is heavily restricted, firewall-insulated, and monitored regularly. Hard copies of driving licences or billing invoices are handled in limited-access zones and shredded securely when no longer required.

## SECTION 8: YOUR CONTRACTUAL DATA SUBJECT RIGHTS

Under the UK GDPR and Data Protection Act 2018, you possess comprehensive legal rights regarding how your personal information is stored and utilised:

- **Right of Access (Subject Access Request):** You hold the right to obtain a verified copy of all personal data held about you by the dealership.
- **Right to Rectification:** The right to mandate the immediate correction of inaccurate or outdated customer records.
- **Right to Erasure ("Right to be Forgotten"):** The right to request the deletion of your data where it is no longer required for active legal, contractual, or tax compliance tracks.
- **Right to Object & Restrict Processing:** The right to halt direct marketing processing or limit specific diagnostic data streams.
- **Right to Withdraw Consent:** Where processing relies on your initial consent, you maintain the absolute right to cancel that authorisation at any time.

To file a formal request regarding your data protection profiles, please contact our administrative desk directly via emailing [sales@kenningtoncarsales.co.uk](mailto:sales@kenningtoncarsales.co.uk).

## SECTION 9: FILING FORMAL PRIVACY DISPUTES

If you hold concerns regarding how Kennington Car Sales Limited handles your privacy settings or tracks personal records, please reach out to our management division immediately via calling **01908 883940** or emailing [sales@kenningtoncarsales.co.uk](mailto:sales@kenningtoncarsales.co.uk) so we can address your issue.

If our final response fails to satisfy your requirements, you retain the statutory right to escalate your privacy complaint directly to the UK independent data protection supervisor:

### Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Official Website Portal: [www.ico.org.uk](http://www.ico.org.uk)

## SECTION 10: POLICY MODIFICATIONS

The Company maintains the right to update this web document periodically to reflect structural shift patterns, system adjustments, or legislative revisions under UK law.