## **Data privacy notice (ordering and enquiring via Framptons Number Plates)**

We value your custom and respect your need for privacy. We promise never to:

- email you marketing information without your prior consent
- share your personal details with any 3<sup>rd</sup> party without your prior consent unless they are named in this privacy policy and the purpose of sharing that data is also outlined in this policy.
- remove your data from our premises at East Bank Road or Jepson & Co's secure data servers, or BT's UK-based cloud servers for telephone recordings.
- hold any personal details any longer than is strictly required by DVLA's number plate regulations (see section 2).

Jepson & Co Ltd (44 East Bank Road, Sheffield, S2 3QN), the owner of Framptons Number Plates (44 East Bank Road, Sheffield, S2 3QN), takes its responsibilities regarding processing of personal data very seriously and has outlined in this privacy notice the data collected, the reason(s) for data collection and processing, and the manner and timescale for deletion. We aim to be fully compliant with all relevant Data Protection regulations, including GDPR.

Please note, GDPR applies only to personal data. In some cases, our relationship with our customer or potential customer is Business-to-Business (B2B) so GDPR rules do not apply. Where personal data may be processed or affected, this policy explains how we process personal data.

The personal information you supply us will only be used for the purpose of fulfilling your enquiry or order by the specialist and data-protection trained team at Framptons. To improve our service, period analysis may occur by the marketing team, but all Data will be Pseudonymised for anonymity and will never be shared with anyone outside the Framptons team.

For clarity, the Data Controller is Jepson & Co Ltd t/a Framptons Number Plates (44 East Bank Road, Sheffield, S2 3QN). The Data Processors include:

- BT telephone cloud servers
- SagePay and/or PayPal (for payments). Please note, we turn off telephone recording temporarily when card details are being taken.
- <u>DVLA</u> (used only in the event of a query regarding legally supplying a very specific style of plate or combination of registration digits).
- Arkom (website provider) and Google Analytics (if leaving us a review and/or photo of your finished plate(s) which you advise can be used on our website).
- Google Reviews (if leaving us a review, please see Google's privacy policy).
- Facebook Reviews (if leaving us a review, please see Facebook's privacy policy).

If you have any queries regarding this Privacy Notice, please contact us on plates@framptons.net

Jepson & Co Ltd ("us", "we", or "our") operates Framptons Number Plates (the "Company"). This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users.

## 1 Data collected and processed

- 1.1 For the legitimate interest of processing enquiries and orders, we may receive personal data from you via:
  - Telephone
    - Our telephone calls are recorded for training and monitoring purposes. We always try to answer calls immediately but in the event of you leaving a voicemail, your voicemail (and any personal information you have given us) will be deleted once it has been actioned (usually within 2 business days).
  - Email (to plates@framptons.net or payments@framptons.net)
    - o Our emails are deleted once processed (usually within 2 business days).
  - Fax to 0114 273 1156
    - o Our faxes are shredded once processed (usually within 2 business days).

The data we collect includes:

- The user (the person enquiring to or ordering from Framptons Number Plates):
  - Their name
  - Their address
  - Their email address
  - The vehicle they wish to put a plate onto
  - Their registration number and the style of registration plate preferred
  - Any other personal details willingly provided in the email signature of the sender.
- Upon proceeding to order, we are required by DVLA to collect certain documentation to identify the vehicle and the person purchasing the plate. These details include:
  - Proof of entitlement to the registration per <u>DVLA's requirements</u>. This may include:
    - The V5C logbook and any details pertaining to the vehicle contained in the V5C.
  - Proof of identification for the person ordering plates: personal identification document per DVLA's requirements

We are also required to take payment, which will be done over the telephone (recording is temporarily stopped during payment) directly into world-renowned supplier SagePay or via PayPal, whichever you prefer.

- 1.2 The data will be collected by the customer service representative during the enquiry process and used to process your enquiry and/or order.
- 1.3 This data may be processed in the following ways:
  - Creation, despatch and monitoring delivery of your order.
  - Queried with the DVLA to ensure legal compliance of style and format.
  - Retention per DVLA regulations on number plates of your name, address, personal identification and other documentation as outlined in this policy.
  - Accessed by authorised authorities (including but not limited to ICO for data protection reasons and DVLA for record-keeping reasons), during a site visit.
  - Analysed in management reports to identify trends and improve our service. All records will be
    pseudonymised and report access is granted to a very limited number of authorised personnel, all onsite at 44 East Bank Road, Sheffield, S2 3QN.
  - Analysed in web services such as Google Analytics.
  - Used to verify your order (telephone recordings).
  - Uploaded and content managed via Arkom (Aizlewoods Mill, Nursery Street, Sheffield, S3 8GG), where you have provided consent for us to include your testimonial and/or photograph(s) on our website.
  - Processed per Google Reviews' privacy policy. Please refer to Google Reviews policy for further information.
  - Processed per Facebook Reviews' privacy policy. Please refer to Google Reviews policy for further information.
- 1.4 All data collected through Framptons remains the property of Jepson & Co. Jepson & Co's role is as a data controller and we process this data property for the reasons outlined in this statement. Jepson & Co appreciate fully the sensitivity of data collected and will not use data collected via Framptons Number Plates for reasons other than outlined in this policy. This may include:
  - Improvement and development of the Framptons service (periodically).
  - Compliance with legally allowable requests from relevant authorities (for example ICO, DVLA, on a periodic or ad hoc basis).
- 1.5 Data will not be shared with any party outside of the Data Controller, Data Processor(s) and regulatory authorities.

## 2 Your rights

- 2.1 Prior to 25<sup>th</sup> May 2018, individuals have rights which they can exercise in relation to the information we hold about you. You can read more about these rights at: <a href="https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/">https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/</a>
- 2.2 From 25<sup>th</sup> May 2018, under the General Data Protection Regulation, individuals have the following rights:
  - a right of access to a copy of the information comprised in their personal data;
  - a right to object to processing that is likely to cause or is causing damage or distress;
  - a right to prevent processing for direct marketing;
  - a right to object to decisions being taken by automated means;
    - o Framptons does not ever make decisions by automated means alone.
  - a right to claim compensation for damages caused by a breach of the Act.
  - a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed; and
  - a right to withdraw consent at any time to any data processing we are doing on your behalf.
    - o To withdraw consent: please contact us on 0114 2731151 or email <u>plates@framptons.net</u>.
    - Please note, if you choose to object, we may be unable to provide you with full services, for example emailed delivery notes.

If you wish to complain about how your data is processed, please contact us on 0114 2731151 or email <u>plates@framptons.net</u>. If you are not satisfied, you may contact the Information Commissioners Office on <a href="https://ico.org.uk/">https://ico.org.uk/</a>.

## 3 Data deletion policy

- 3.1 Telephone recordings are deleted after a period of 1 month from the date of the last call unless a query arises in which case they will be deleted after a maximum of 3 months from the date of the last call.
- 3.2 **Retail orders**: all data pertaining to retail orders is deleted following the mandatory retention period set by HMRC, currently this is 7 years.
- 3.3 **Retail enquiries**: the majority of data is deleted after 1 month. All data is deleted a maximum of 3 months after receipt, in case of a repeat enquiry during this period.
- 3.4 **Trade enquiries**: the majority of data is deleted after 1 month. All data is deleted a maximum of 3 months after receipt, in case of a repeat enquiry during this period. This ensures that your customers' privacy is protected. We strongly recommend all our trade customers implement the policies of GDPR and are happy to support with advice on this matter.
- 3.5 **Trade orders and accounts**: If you are a current or previous trade customer, your records will remain on our system until we are notified in writing to <a href="mailto:plates@framptons.net">plates@framptons.net</a> that you would like your business data to be suppressed.