



## GREEN TOMATO CARS LIMITED PRIVACY POLICY

At Green Tomato Cars Limited we take privacy seriously and we are committed to protecting it.

This policy explains when and why we collect personal information about individuals, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure.

This policy may change from time to time so please check this page occasionally to ensure that you're happy with any changes.

This policy was last updated in May 2018. Please see the section on [Changes to this policy](#) at the end of this privacy policy.

### WHO WE ARE

Green Tomato Cars Limited, company number 05276431 is the data controller in relation to the processing activities described below. This means that Green Tomato Cars Limited decides why and how your personal information is processed.

Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to the particular company that is the controller of your personal information.

### HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information from you in the following ways:

#### Personal information you give to us:

This is information about you that you give to us by entering information via:

- our site (<https://www.greentomatocars.com/>);
- by telephone to make a booking;
- our mobile applications;
- social media platforms;
- corresponding with us by phone, email or otherwise,

and is provided entirely voluntarily. This includes information provided at the time of registering to use our site, subscribing to the services we provide through our site, posting material or requesting further services, managing your account online (including payments, accessing documentation and engaging in correspondence with us by phone, email or otherwise) or using our mobile booking app to order services and make payments. We may also ask you for information when you report a problem with our site. If you complete any surveys that we request you complete for research purposes, we will collect information in such circumstances as well. The information you give us includes your name, address, email address and phone number, payment and bank details, journey details, location tracking and may include records of any correspondence.

#### Personal information we collect about you:

We may automatically collect the following information: details of transactions you carry out through the site, and your visits to our site, including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources you access. We may also automatically collect technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system, referral source, platform and length of visit. Please see [Cookies](#) for further information. We may also collect any personal information which you allow to be shared that is part of your public profile or third party social



network, type and version, time zone setting, browser plug-in types and versions, operating system and platform.

#### **Personal information we may receive from other sources:**

We obtain certain personal information about you from sources outside of our business which may include other third party companies such as credit card companies. The categories of personal information that we may obtain from these sources are pre-authorisation check information for credit cards, other payment information, contact information which can be used to address, send or otherwise communicate a message and Geo-location - information which contains or reveals the location of an electronic device. Details of third parties are available on request.

#### **TYPE OF PERSONAL INFORMATION WE PROCESS ABOUT YOU**

We may process a range of personal information about you, including **contact** (information which can be used to address, send or otherwise communicate a message to you), **address** (information which contains or reveals locations visited by you) **monitoring** (information relating to the surveillance or monitoring of your activities), **banking/billing** (information used to receive funds from you for our services), **cardholder** (your payment card details), **sales** (information relating to the sale of products or services to you) and **correspondence** (information contained in our correspondence or other communications with you about our products, services or business).

#### **HOW WE USE YOUR PERSONAL INFORMATION**

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are explained below.

#### **Where you have provided CONSENT**

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- contact you via email or text with marketing information about our goods and services if you (i) register for an account and/or make a booking with us online and indicate that you would like to receive such marketing from us; (ii) sign up to our newsletter, emails/ texts via our website or other medium where available; or (iii) when you refresh your marketing preferences when responding to a request from us to do so.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Withdrawing your consent](#) for further details.

#### **Where there is a LEGITIMATE INTEREST**

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business, or that of a third party, for the following purposes:

- for marketing activities (other than where we rely on your consent to contact you by email or text with information about our products and services or share your details with third parties to do the same, as explained above);
- for analysis to inform our marketing strategy, and to enhance and personalise your customer experience (including to improve the recommendations we make to you on our website, in our App and via emails);
- to correspond or communicate with you;



- to verify the accuracy of data that we hold about you and create a better understanding of you as a customer;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- for prevention of fraud and other criminal activities;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- to assess and improve our service to customers through recordings of any calls with our contact centres;
- for the management of queries, complaints, or claims;
- for the establishment and defence of our legal rights;
- to administer the website or mobile application

### **Where there is a LEGAL REQUIREMENT**

We will use your personal information to comply with our legal obligations: (i) to assist a public authority or criminal investigation body; (ii) to identify you when you contact us; and/or (iii) to verify the accuracy of data we hold about you.

### **Where it is required to complete a CONTRACT**

We may use and process your personal information where we have supplied you (or continue to supply you) with any products or services, where we have arranged for the supply of another company's products or services to you, or where you are in discussions with us about any new product or service. We will use this information in connection with the contract for the supply of products or services when it is needed to carry out that contract or for you to enter into it. Please see [Type of personal information we process](#) about you above for details of the types of personal information we process for these purposes.

## **OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION**

### **Our suppliers and service providers**

We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud service providers (such as hosting and email management), advertising agencies and administrative services.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

### **Credit/debit card payment processors**

When you purchase any products or services online, your credit/debit card payment is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us using the details at the end of this policy.

### **Customer satisfaction surveys**

As customer satisfaction is important to us, we may ask a third party research company to contact you for the sole purpose of gathering general information and specific information relating to us and our products and services.

### **Other ways we may share your personal information**



We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

## **WHERE WE STORE YOUR PERSONAL INFORMATION**

All information you provide to us may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen if any of our servers or those of our third party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK.

If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this policy for more information about the protections that we put in place and to obtain a copy of the relevant documents.

If you use our services whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

## **HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than is necessary.

We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the date it is no longer needed by us for any of the purposes listed under [How we use your personal information](#) above. The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [Erasing your personal information or restricting its processing](#) below); or
- in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

## **SECURITY AND LINKS TO OTHER SITES**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our website and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.



Our website may contain links to other websites run by other organisations. This policy does not apply to those other websites, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## **COOKIES**

Like many other websites, our website uses cookies which are small pieces of information sent to your computer or device and stored on its hard drive to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies you may not be able to access all or parts of our website.

## **MARKETING**

We may collect your preferences to receive marketing information directly from us by email, SMS, push notifications in the following ways:

- E.g. if you register an account with us online, we will ask you if you would like to provide your consent to receive marketing information directly from us; or
- E.g. if you make a sales enquiry or place an order we may contact you with marketing information in the ways mentioned in the notices presented to you, except where you indicate you would prefer otherwise,

and we will only do so if you have consented to receive such marketing information directly from us.

We may contact you with marketing information by post or by telephone or with targeted advertising delivered online through social media and platforms operated by other companies by using your personal information, or use your personal information to tailor marketing to improve its relevance to you, unless you object.

From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you consent to continue receiving marketing information from us.

You have the right to opt-out of our use of your personal information to provide marketing to you in any of the ways mentioned above. Please see [Withdrawing your Consent](#) and [Objecting to our use of your personal information and automated decisions made about you](#) above for further details on how you can do this.

## **YOUR RIGHTS**

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

- **Accessing your personal information**

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.



- **Correcting and updating your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy.

- **Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, as set out under [How we use your personal information](#), you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so by requesting an update or changing your preferences over the phone through our bookings line, by email to [customercare@greentomatocars.com](mailto:customercare@greentomatocars.com) or, if you are registered with an account, on your account profile; or by unsubscribing from an email that we have sent to you using the unsubscribe link in that email.

If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

- **Objecting to our use of your personal information and automated decisions made about you**

Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as out under [How we use your personal information](#), you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

- You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, you can inform us by requesting an update or changing your preferences over the phone through our bookings line, by email to [customercare@greentomatocars.com](mailto:customercare@greentomatocars.com) or, if you are registered with an account, on your account profile. **Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

- **Transferring your personal information in a structured data file**

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under [How we use your personal](#)



[information](#), you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- **Complaining to the UK data protection regulator**

You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the [ICO's website](#) for further details.

## **CHANGES TO THIS POLICY**

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our website and/or by contacting you by email. Any changes will take effect 7 days after the date of our email or the date on which we post the modified terms on our website, whichever is the earlier. We recommend you regularly check for changes and review this policy whenever you visit our website. If you do not agree with any aspect of the updated policy you must immediately notify us and cease using our services.

## **CONTACT US**

Please direct any queries about this policy or about the way we process your personal information for the attention of our Privacy Officer using our contact details below.

If you wish to write to us, please write to us at the following address: Green Tomato Cars Limited at Qwest, Unit 3.11 1110 Great West Road, Brentford, Middlesex, England, TW8 0GP

Our email address for data protection queries is [customer care@greentomatocars.com](mailto:customer care@greentomatocars.com).