

Privacy Policy

THE DAVID BOATWRIGHT PARTNERSHIP LIMITED

1. Who we are

The David Boatwright Partnership Limited (“we”, “us”) is the controller of the personal information described in this policy. We are registered in England and Wales under company number 06408436. Our registered office is 146 New London Road, Chelmsford, Essex CM2 0AW and we trade from 1 Chilford Court, Rayne Road, Braintree, Essex CM7 2QS.

We are registered with the Information Commissioner's Office under registration reference ZA502464.

We are authorised and regulated by the Financial Conduct Authority for consumer credit activities (FRN 657576) and act as a credit broker, not a lender. For general insurance distribution we are an Appointed Representative of Automotive Compliance Ltd (FRN 497010).

For anything to do with your personal information, contact us at 1 Chilford Court, Rayne Road, Braintree, Essex CM7 2QS, by email at sales@boatwright.co.uk or by telephone on 01376 552399. Please mark your message “Data protection”.

This policy covers our website, enquiries, vehicle sales and purchases, part-exchanges, finance introductions, servicing and after-sales, and visits to our premises.

2. The information we collect

Category	Examples
Contact and identity details	Name, address, email, telephone numbers, date of birth, signature
Identity verification documents	Driving licence, passport, proof of address, where needed for fraud prevention, test drives, finance or registration
Transaction details	Vehicles you enquire about, order, buy or sell to us; prices, deposits and payments; bank details for refunds or part-exchange payments; delivery and nominee details
Vehicle details	Registration number, VIN, mileage, service and ownership history, outstanding finance on a part-exchange
Finance application details	Employment, income, outgoings, address history and bank details that you give us to pass to a lender
Communications	Emails, letters, messages, call notes and complaints
Website and device data	IP address, browser type, pages viewed and cookie data (see section 9)
CCTV images	Images recorded by the CCTV system at our premises, for security and the prevention and detection of crime

Marketing preferences Whether you have asked to receive, or opted out of, news and offers

We do not knowingly collect information from children, and we do not ask for sensitive information such as health data. If a vehicle adaptation makes such information relevant, we will use it only with your explicit consent.

3. Where the information comes from

Most information comes directly from you, through our website, by telephone, email or messaging, or in person. We also receive information from:

- vehicle history and provenance check providers, about a vehicle you are selling or part-exchanging;
- DVLA and DVSA, in connection with registration, approval and MOT records;
- finance providers, who tell us the outcome of an application we have introduced;
- someone acting for you, such as a nominee collecting a vehicle;
- fraud prevention and identity verification services; and
- publicly available sources such as Companies House.

4. Why we use your information and our legal basis

Purpose	Legal basis
Answering enquiries, preparing quotations, arranging viewings and test drives	Steps taken at your request before a contract; our legitimate interest in running our business
Selling, sourcing, importing, approving, registering and delivering vehicles; buying vehicles and part-exchanges; taking and refunding payments	Performance of our contract with you
Verifying identity, preventing fraud and checking sanctions lists	Legal obligation; our legitimate interest in protecting ourselves and our customers from fraud
Introducing you to finance or insurance providers at your request	Steps taken at your request before a contract; legal obligation under Financial Conduct Authority rules
Warranty, servicing, after-sales support and safety recall notices	Performance of contract; legal obligation; our legitimate interest in vehicle safety
Keeping accounting, tax and regulatory records	Legal obligation
Handling complaints and legal claims	Legal obligation; our legitimate interest in establishing and defending legal claims

Sending news and offers about our vehicles and services	Your consent, or our legitimate interest where you are an existing customer and have not opted out (see section 8)
Operating and securing our website and premises, including CCTV	Our legitimate interest in security and in improving our website; consent for non-essential cookies

Where we need information to enter into or perform a contract, or to meet a legal requirement, and you do not provide it, we may be unable to proceed with the transaction.

We do not make decisions about you by solely automated means. A finance provider may use automated credit scoring; its own privacy notice will explain this.

5. Who we share your information with

We share information only where needed for the purposes above, with:

- DVLA, DVSA, HMRC and other government bodies, for registration, approval, import and tax;
- finance providers and insurers you ask us to approach, and Automotive Compliance Ltd, which oversees our insurance activities and may audit our records. Lenders may search your record at credit reference agencies; they will tell you before doing so;
- warranty, breakdown and service plan providers for a product supplied with your vehicle;
- vehicle manufacturers and their agents, for warranty and safety recalls;
- vehicle history check providers, to confirm the status of a vehicle you are selling to us;
- shipping, transport and delivery companies;
- our bank and payment providers;
- suppliers who provide our IT, website hosting, email, newsletter delivery (Mailchimp, operated by Intuit Inc. in the United States), telephone and document storage, under contracts that require them to protect your information;
- our professional advisers, insurers and any alternative dispute resolution body handling a complaint;
- the police, regulators, courts and fraud prevention agencies, where the law requires or permits; and
- a buyer of our business, under confidentiality terms, if the business is sold or reorganised.

We do not sell your personal information.

6. Transfers outside the United Kingdom

Many of our vehicles are sourced from the United States and Canada. Where an order, warranty claim or recall requires it, we may send limited information, usually the vehicle's details and occasionally your name, to suppliers or manufacturers there. Some of our IT suppliers may also

store information outside the UK. In each case we rely on UK adequacy regulations, the UK International Data Transfer Agreement or Addendum, or another safeguard or exception permitted by UK data protection law. You can ask us for details.

7. How long we keep your information

Record	Period
Enquiries and quotations that do not lead to a sale	12 months from last contact
Sales, purchase, part-exchange and warranty records, including copies of identity documents taken for the transaction	6 years after the end of the tax year of the transaction, or longer while a warranty, complaint or claim is live
Finance and insurance introduction records	As required by Financial Conduct Authority rules, normally at least 6 years
Complaint records	6 years from closure
Marketing contact details	Until you opt out, or 3 years after your last contact with us
CCTV images	30 days, unless needed to investigate an incident or requested by the police or an insurer
Website analytics data	None collected. See our Cookie Policy

At the end of the period we delete or anonymise the information securely.

We protect your information with access controls, secure storage and staff confidentiality obligations. No system is completely secure; if a breach is likely to put you at high risk we will tell you without undue delay.

8. Marketing

We send news and offers by email or text only if you have asked to receive them, for example by joining our newsletter, or if you have bought from us or negotiated to buy from us, the messages are about similar vehicles and services, and you were given the chance to opt out when we collected your details. Every message includes a way to unsubscribe, and you can opt out at any time by contacting us. We do not pass your details to other organisations for their marketing.

9. Cookies and similar technologies

Our website does not use analytics, advertising or tracking cookies. It uses a small number of cookies and similar technologies that are needed for the site to work or that remember a choice you have made. Full details are in our Cookie Policy. In summary:

Cookie or service	Provider	Purpose	Duration
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MCPopupClosed	Mailchimp (Intuit)	Remembers that you have closed our newsletter sign-up box so it is not shown again	About 1 year
Security cookies	boatwright.co.uk	Protect the site against malicious traffic	Session or up to 24 hours
Newsletter sign-up script	Mailchimp (Intuit)	Displays the sign-up box and sends your email address to Mailchimp if you subscribe	Not a cookie
Web fonts	Google Fonts	Delivers the typefaces used on the site; your browser's IP address is sent to Google to do this. No cookies are set	Not a cookie

Our website links to our pages on Facebook, Instagram and other platforms. Those platforms are responsible for the information they collect when you visit them.

10. Your rights

You have the right to:

- ask for a copy of the information we hold about you;
- ask us to correct information that is inaccurate or incomplete;
- ask us to delete information, where we have no good reason to keep it;
- ask us to restrict how we use your information;
- object to our use of your information where we rely on legitimate interests, and object at any time to direct marketing;
- receive information you gave us in a portable format, where we process it by automated means under contract or consent; and
- withdraw consent at any time, where we rely on consent. This does not affect anything done before withdrawal.

To use any of these rights, contact us using the details in section 1. We may need to confirm your identity. We will respond within one month; the law allows this to be extended for complex or numerous requests, and we will tell you if so. There is normally no charge.

11. Complaints

If you are unhappy with how we have handled your personal information, please tell us first, by any of the routes in section 1. We will acknowledge your complaint within 30 days, investigate it and tell you the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office: ico.org.uk/make-a-complaint, telephone 0303 123 1113, or Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

12. Changes to this policy

We may update this policy from time to time. The current version is always on our website with the date it was last updated. If a change significantly affects how we use information we already hold about you, we will tell you.