



Privacy Notice

Tootle

Last Updated: 11th April 2022

Tootle

9 Millars Brook, Molly Millars Lane, Wokingham, RG41 2AD
+44 (0)118 4662126 | help@tootle.co.uk | www.tootle.co.uk



1. Notice Statement

1.1 Tootle offers a subscription service to Dealerships to help facilitate the Dealership and Sellers transactions of part-exchanging or selling the Sellers vehicle. Tootle acts as a processor and processes the data provided to by the Dealerships and Sellers to fulfill the service to both Users.

1.2 This privacy policy applies to people who sell vehicles through the Service ("Sellers"), people who buy vehicles through the Service ("Dealerships") and people who browse our Website or otherwise contact Us. This privacy notice includes information on what personal data We collect from you, how We use your personal data, who We share your personal data with, and your rights in relation to it.

1.3 Tootle takes the issue of security and data protection very seriously and strictly adheres to guidelines published in the United Kingdom Data Protection Act of 2018 and the General Data Protection Regulation (EU) 2016/679.

1.4 This policy is under regular review and the latest version of this policy is available on our website at all times.

2. Personal Data We Collect from You

2.1 When you access and use our Website and/or access, use and/or subscribe to our Service, We may collect and handle the following information (or personal data) about you:

- information that you provide by filling in forms on the Website (for example, your name, contact details and vehicle registration mark). This includes information provided at the time of registering to use our Website, subscribing to our service or requesting further information or services;
- details of transactions you carry out through the Website;
- information you provide when you report a problem with our Website;

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- records of your correspondence with Us;
- information you provide to Us when you complete customer satisfaction surveys;
- Details of your visits to our Website and the resources that you access including, but not limited to, traffic data, location data, weblog statistics and other communication data.

2.2 If you are a Seller, then you are contractually required to provide Us with:

- your personal details; including your contact details, full name and address
- certain information relating to the your vehicle; including the registration details, mileage, and any existing finance agreements relating to the vehicle
- certain documents required to verify the information you have provided to us in relation relating you and your vehicle

2.3 You may not be able to register to use Our Website, or sell Your vehicle through our Website, without first providing that information.

2.4 If you are a Dealership, then you are contractually required to provide Us with:

- your personal details; including your contact details, full name and place of work

2.5 We do not knowingly process any child data through the Service.

3. Use of your information

3.1 The information that we collect, process and store relating to you is used to enable us to provide our services to you, such as if you have signed up to receive marketing or if you are a user of our services, including offering you support as a user of our services.

3.2 We will only collect and process personal data for the specific purposes notified to the data subject when the data was first collected or for any other purposes specifically permitted by the applicable Privacy Law. This means that

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personal data will not be collected for one purpose and then used for another. Further processing for archiving in the public interest, scientific research or statistical purposes shall, in accordance with Privacy Law, not be considered incompatible with the initial purpose. If it becomes necessary for us to change the purpose for which the data is processed, we will inform the data subject of the new purpose before any processing occurs.

4. Legal Basis for Our Use of Your Personal Data

4.1 Under the General Data Protection Regulation (GDPR) a company must have a Lawful Basis for Processing the data of which they hold. Tootle recognises our lawful basis for processing as;

- **Contractual.** Upon signing our Order Form and other agreements which form the entire agreement, You (Dealership) have given us contractual obligations to process the personal data provided to fulfil the services and provide support to individuals using our services.
- **Legitimate Interest.** We have a legitimate interest in the data we hold and process. We need the data we collect and process to fulfill our working requirements such as assisting you with using our product and providing our Services to You.
- **Consent.** Upon registering as a User, you consent to our terms and Conditions and this Privacy Notice and provide to Us all data required.

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5. Personal Data Retention and Keeping it Secure

5.1 We take appropriate measures to ensure that any personal data is kept secure and kept only for so long as is necessary for the purpose for which that data is used (as set out in this Privacy Notice).

5.2 We are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and take all reasonable precautions to safeguard the confidentiality of personal data.

5.3 Although We make every effort to protect the personal data which you provide to us, the transmission of information via the internet is not completely secure. As such, you acknowledge and accept that We cannot guarantee the security of your personal data when transmitted to our site and that any such transmission is at your own risk. Once We have received your personal data, We will use strict procedures and security features to prevent unauthorised access. Where We have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

5.4 Personal data that We hold about you is stored within the EEA.

5.5 Personal data will not be kept longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems in a safe way when it is no longer required. For guidance on how long certain data is likely to be kept before being destroyed, you can request this by emailing us at gdpr.enquiries@tootle.com.

6. How We Share Your Personal Data

6.1 Once you have registered to use our Website as a Seller, certain personal data will be made available to the Dealership, such as the vehicle registration mark, to facilitate selling and offers.

6.2 We may also share your personal data with the following third parties:

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- We share certain personal data about Sellers with Dealerships, and about Dealerships with Sellers to facilitate the sale and purchase of a vehicle through the Service.
- to any member of our group of companies and our investors for internal administrative purposes (to support us with our accounting and marketing practices)
- companies who helps us to verify the details that you have provided to Us, including the finance arrangements, model details and status of vehicles
- our service providers and subcontractors, including suppliers of technical and support services, and cloud service providers
- to any third parties providing details, including but not limited details of pricing, of your vehicle.

6.3 We may also share your personal data to third parties:

- in the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets
- if substantially all of our assets are acquired by a third party, in which case personal data held by Us about you will be one of the transferred assets
- if We are under a duty to disclose or share your personal data in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity
- to enforce or apply our User Terms and Conditions and other agreements
- to protect the rights, property, or safety of Us, other users of our Website or any other persons; this may include sharing personal data with other organisations for the purposes of fraud protection and credit risk reduction

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7. Your Rights

7.1 Tootle would like to make sure you are fully aware of all of your data protection rights. Every user may be entitled to the following rights, subject to refusal in circumstances outlined by the Supervisory Authority :

The right to access – You have the right to request Tootle for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request Tootle to complete the information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Tootle restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Tootle processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

7.2 If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

Email: gdpreenquiries@tootle.co.uk

Telephone: 0118 997 7740

Postal: 9 Millars Brook, Molly Millars Lane, Wokingham, Berkshire, RG41 2AD

8. Links to Third Party Websites

8.1 The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that this Privacy Notice only applies to the personal data that we collect through our Website and We cannot be responsible for personal data collected and stored by third parties on their websites. If you follow a link to any such third party websites, please note that these websites may have their own privacy policies and terms of use. You

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should read those policies carefully before you submit any personal data to those websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

9. Use of Cookies

9.1 Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. On occasion, we may gather information about your computer for our services. Such information will not identify you personally, it is statistical data about our visitors and their use of our site and does not identify any personal details whatsoever. It is used by us to analyse how visitors interact with the Website so that we can continue to develop and improve it and make your browsing experience more useful, more relevant and tailored to you.

9.2 Some of the cookies we use will expire after you close the browser window. These are called session cookies. Some cookies last longer than this, because they are used to identify return visits to the website, for such data as keeping you logged in or for remembering your previously selected preferences.

9.3 Please see below a breakdown of cookies we use on our website:

- Google Analytics: We use Google Analytics cookies to track the movement of users across the site, page views, journeys, funnels etc. This information allows us to understand individual behaviours and needs more accurately, allowing us to give you a better experience while using Tootle. For more information on how Google uses the data collected via this service, see here: <http://www.google.com/policies/privacy/partners/>. To opt out of being tracked via Google Analytics, you can also use Google's opt-out browser add-on: <https://tools.google.com/dlpage/gaoptout>.
- Google Optimise: We use Google Optimise to allow us to test different versions of our Website with different users. This allows us to use data to improve the usability of our site and give you a better experience with Tootle.

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- Tootle: only Strictly Necessary and Functional cookies are implemented. This allows us to smooth your journey around the site to support your login and create and manage your listing or access the dealer admin functions.
- HubSpot: Used to track and record visitors on the site and used for user authentication.

9.4 All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. We also have a cookie banner for your convenience. Please note that should you decline cookies, you may be unable to access particular areas of the website.

For more information on cookies you can read the guidance at [All About Cookies](#)

10. Further Questions and How to Make a Complaint

10.1 If you would like to contact us about our collection, use or storage of your personal data, or if you wish to exercise any of your rights in relation to your personal data, please contact gdpr.enquiries@tootle.com

10.2 If you are concerned that we are not using your information in accordance with the law, or are not satisfied with our response to a request made above, then you can complain to the Information Commissioner's Office.

The Information Commissioner in Scotland can be reached by the following means;

Postal: The Information Commissioner's Office – Scotland, 45 Melville Street, Edinburgh, EH3 7HL

Email: Scotland@ico.org.uk

Phone: 0303 123 1115

The Information Commissioner in England can be reached by the following means;

Postal: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Phone: 0303 123 1113

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