



PRIVACY POLICY

Date: 15th May 2018

As the operators of the Tootle website ("**Website**"), Online Auto Sales Ltd – a company registered in England and Wales with company number 09325623, having its registered office at Cornwall Court, 19 Cornwall Street, Birmingham, B3 2DT ("**Tootle**", "**We**", "**Us**") – is committed to protecting and respecting your privacy. Online Auto Sales Ltd is the "data controller" for the purposes of data protection laws.

This privacy policy applies to people who sell vehicles through the Website ("**Sellers**"), people who buy vehicles through the Website ("**Buyers**") and people who browse our Website or otherwise contact Us. This privacy policy 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.

Please read this privacy policy carefully.

PERSONAL DATA WE COLLECT FROM YOU

When you access and use our Website, 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 and of the fulfilment of your orders;
- information you provide when you report a problem with our Website;
- records of your correspondence with Us;
- information you provide to Us when you complete customer satisfaction surveys;
- if you are a Buyer, yours or your business' bank account details, so that we can send you an invoice when you purchase a vehicle through the Website;
- details of your visits to the Website (including traffic data, location data, weblogs and other communication data, and the resources that you access) and how you came through to our Website;
- details of any third party sites accessed via the Website;
- we may also collect information about your mobile phone, computer or other device from which you access the Website; including, where available, your IP address, operating system and browser type. We may use such information in conjunction with the data We have about you in order to track your usage of the Website.

Information about how you use our Website is collected through our use of cookies. You can find more information on how we use cookies on our Website in our Cookies Policy, which is available here: <https://www.tootle.co.uk/cookie-policy>

If you are a Seller, then you are contractually required (under Clause 8 of our User Terms and Conditions (which you can find here: <https://www.tootle.co.uk/userterms> 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; and

- certain documents required to verify the information you have provided to us in relation relating you and your vehicle.

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

If you are a Seller and you have come to our Website through one of our partners (such as Dennis Publishing, Haymarket or Confused.com), then we may receive certain personal data about you from those partners; including, your vehicle registration mark and your contact details.

HOW WE USE YOUR PERSONAL DATA

We use your personal data for the following purposes:

- to enable you to register and use our Website, and to buy and sell vehicles through our Website;
- to communicate with you; particularly, in relation to your purchase or sale of a vehicle through the Website (for example, if you are a Seller, to let you know when a Buyer has made an offer for your vehicle and, if you are a Buyer, to let you know whether the Seller has accepted your offer);
- to respond to your queries and requests;
- to ask you to complete customer satisfaction surveys for research purposes (although you do not have to respond to these);
- to keep you updated with Tootle news, improvements to our Website and service, and to send you other communications promoting our services (for example, if you haven't used your account for a while) – you can let us know at any time if you would rather not receive these types of communications;
- for profiling and statistical analysis of how you use our Website, so that we can inform and better target our advertising and social media campaigns; and
- to notify you about changes to our Website and services, to our User Terms and Conditions, to this privacy policy or to other policies or documents which govern our relationship with you.

We may also use your personal data to:

- establish, exercise or defence our (or a third party's) legal rights; and
- comply with those procedures, laws and regulations which apply to us.

LEGAL BASIS FOR OUR USE OF YOUR PERSONAL DATA

Data protection and privacy laws require us to have what's called a "legal basis" or "lawful ground" for handling personal data. Broadly, that means that we have to have a legal justification for handling your personal data. We consider that our use of your personal data as set out in this privacy policy:

- is necessary to perform our obligations under any contract with you (for example, to comply with our obligations under the User Terms and Conditions); or
- is necessary to comply with our legal obligations; or
- where not necessary for performance of our obligations under any contract with you or to comply with our legal obligations, is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our Website, to run and grow our business and to constantly improve our Website and services).

HOW LONG WE RETAIN YOUR PERSONAL DATA, AND HOW WE KEEP IT SECURE

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 policy). More detail can be found in our retention policy, which can be found here: www.tootle.co.uk/data-retention-policy

We are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal data. 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 Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

HOW WE SHARE YOUR PERSONAL DATA

Once you have registered to use our Website to buy or sell a vehicle, certain personal data will be made publically available on the Website; such as the vehicle registration mark. You can remove a listing from our Website by contacting [Hello@tootle.co.uk](mailto>Hello@tootle.co.uk).

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

- We share certain personal data about Sellers with Buyers, and about Buyers with Sellers to facilitate the sale and purchase of a vehicle through the Website. For example, We share the vehicle's registration mark with potential Buyers via e-mail as soon as a vehicle is placed on the Website and we share the parties' contact details as soon as an offer has been made on a vehicle;
- if you are a Seller and you have come to our Website through one of our partners (such as Dennis Publishing, Haymarket or Confused.com), We may share certain personal data back with those partners about the sale and purchase of your vehicle;
- 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; and
- our service providers and sub-contractors, including suppliers of technical and support services, and cloud service providers.

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; or
- 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; or
- 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; or
- 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.

WHERE WE STORE YOUR PERSONAL DATA

Personal data that We hold about you is primarily stored in the UK and in other countries within the European Economic Area (such as Ireland). Some personal data is transferred outside the UK and the European Economic Area – specifically, to the U.S.A. – for IT support purposes.

Please be aware that countries which are outside the European Economic Area (including the U.S.A.) may not offer the same level of legal protection for your personal data as under UK law, although any collection, storage and use of your personal data by Us (or on our behalf) will continue to be governed by this privacy policy.

Where We transfer personal data outside the UK and the European Economic Area, We have included standard data protection clauses approved by the European Commission for transferring personal data outside the European Economic Area into our contracts with the relevant third parties (these are the clauses approved under Article 46(2) of the General Data Protection Regulation).

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

You have certain rights in relation to your personal data. You may have the right to:

- access any personal data We hold about you;
- obtain a copy of any personal data We hold about you.
- request that We update or change any personal data which is out of date or incorrect (you can also update certain personal data on our Website);
- object to the way that We use your personal data;
- request that we restrict the way We use your personal data;
- request that We delete any personal data We hold about you; or
- provide your personal data to a third party provider of services.

We will consider all requests and provide our response within the time period stated by law. However, please note, that those rights do not always apply, and there are certain exceptions to them (for example, if We need to keep using your personal data to provide you with our services or to comply with a legal obligation).

If you would like further information in relation to those rights, or if you would like to exercise any of them, please contact Us by email at Hello@tootle.com at any time.

LINKS TO THIRD PARTY WEBSITES

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 policy 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 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.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this privacy policy at any time. Any changes We may make to this privacy policy in the future will be notified and made available to you using the Website.

INFORMATION ABOUT OUR USE OF COOKIES

Our Website uses cookies 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 the Website. You can find more information on the cookies used on the Website in our Cookies Policy, which is available here: <https://www.tootle.co.uk/cookie-policy>

FURTHER QUESTIONS AND HOW TO MAKE A COMPLAINT

If you have any queries, comments, requests or complaints 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 [Hello@tootle.com](mailto>Hello@tootle.com). We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data

You may also make a complaint to the Information Commissioner's Office (<https://ico.org.uk/>), the UK's data protection regulator.