



## Arwel's Agri Services Ltd PRIVACY POLICY

**Arwel's Agri Services** is committed to protecting your personal information and complying with all applicable legislation in relation to data protection. This policy describes how we collect, use and disclose your personal information.

This policy applies to any personal information about you that you provide to Arwel's Agri Services or which is provided to Arwel's Agri Services by third parties.

The data controller in respect of personal information processed under this policy is Arwel's Agri Services (a company incorporated in England with company number 7393050) whose registered office is at Troedrhwi, Harford, Llanwrda, Carmarthenshire SA19 8DS.

We have An email [info@arwelagri.co.uk](mailto:info@arwelagri.co.uk) should you have any comments or queries in relation to this policy or Arwel's Agri Services use of your personal information.

### WHY DO WE COLLECT PERSONAL INFORMATION ABOUT YOU?

Arwel's Agri Services Ltd collects personal information about you to provide you with our products and services and to improve and develop these for the future.

### WHAT PERSONAL INFORMATION DO WE COLLECT?

Arwel's Agri Services collects the following types of personal information from you:

- Name
- Date of Birth
- Address and address history
- Contact details such as email address and telephone numbers
- VAT registration number
- Identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address
- Vehicle and/or machine registration and identification numbers
- Telematics information about the location of your vehicle and/or machine

### HOW DO WE RECEIVE PERSONAL INFORMATION ABOUT YOU?

Arwel's Agri Services receives personal information about you:

- When you contact us directly, visit our website [www.arwelagri.co.uk](http://www.arwelagri.co.uk) or use our social media channels, whether to apply for one of our products or services or to make an enquiry or other request.
- Arwel's Agri Services is an approved dealer of J C Bamford Excavators (JCB). If you approach JCB they will provide us with your personal data based upon the machine specification and your geographical location.
- From our other group companies and our carefully selected business partners who provide products and services, such as introducing brokers, fraud prevention or credit reference agencies or trade bodies. – [REVIEW FOR RELEVANCE]

### HOW DO WE USE PERSONAL INFORMATION ABOUT YOU?

Arwel's Agri Services and its group may use your personal information for the following purposes:

- To verify your identity and to identify you when you contact us.
- As a precursor to entering into or fulfilling a contractual obligation.
- To make decisions on credit, insurance and other facilities, about you, your financial associate(s), members of your household or your business
- To help to prevent fraud and money laundering
- To help administer, and contact you about improved administration of, any accounts, services and products we have provided before, or provide now or in the future.
- Recover debts that you owe and trace your whereabouts.
- To comply with legal obligations.
- To carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical information using data provided by you.
- To carry out statistical analysis to help with decisions about account management.
- To contact you for marketing purposes relating to products and services that we think will be of potential interest to you.

Any personal data provided to third parties for the purpose of financing will be processed in accordance with their Privacy Policy. Please refer to the Privacy Policy of the financial organisation for details on how your personal data is processed.

We retain the right, to access, view and interrogate JCB Livelink or any successor telematics system operating on JCB Products that have been supplied by us. We may use this system to verify the location, mode of operation, service history or/any other information held on the system regarding operation and/or performance of such JCB Products.

#### **WHO DO WE PROVIDE THIS PERSONAL INFORMATION TO?**

Arwel's Agri Services will provide your personal information to:

- The JCB group if you are acquiring or are interested in acquiring JCB Products.
- Affiliated manufacturers if you are acquiring or are interested in acquiring their products.
- Financial services providers, such as our preferred supplier of finance facilities JCB Finance Ltd.
- Fraud prevention agencies, trade bodies and credit reference agencies.
- Marketing providers.
- Third party debt collection agencies, insolvency practitioners and legal advisors.
- Law enforcement agencies, government departments, courts, regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities.
- JCB Finance Ltd who provide machinery quotation software to us.
- Our service providers who perform services on our behalf, such as banking services and data management firms.

#### **WHAT WILL ARWEL'S AGRI SERVICES DO WHEN YOU APPLY FOR OUR PRODUCTS OR SERVICES?**

##### **FRAUD PREVENTION & MONEY LAUNDERING**

Before we provide products or services to you Arwel's Agri Services may undertake checks for the purposes of preventing fraud and money laundering and to verify your identity.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

### AUTOMATED DECISIONS

Our credit risk management partners may use a scoring or other automated decision-making system to assess your applications and to verify your identity. This means we may automatically decide that you pose a fraud or money laundering risk if:

- Our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or
- You appear to have deliberately hidden your true identity.

You have rights in relation to automated decision making, if you want to know more please contact our Data Protection Officer.

### CONSEQUENCES OF PROCESSING

If we determine that you pose a fraud or money laundering risk, we may refuse to provide the products or services you have requested, or we may stop providing existing products or services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you.

### CREDIT RECORDS – CREDIT REFERENCE AGENCIES

In considering your applications we will search your credit record together with the record of any partners, other officers or beneficial owners at the credit reference and fraud prevention agencies, along with the record of your business. Information held about you, any partners, other officers or beneficial owners, by the credit reference agencies may already be linked to others with whom you have a joint account or similar financial association. All parties' information may be taken into account when considering applications so you should make sure you discuss this with them, **and share with them this information, before lodging the application.**

Whether or not your applications proceed, the credit reference agency will place a record of our search on your credit file. This record (but not our name) will be seen by other organisations when you apply for credit in the future. A large number of applications within a short period of time could affect your ability to obtain credit.

Whether or not your applications proceed, the credit reference agencies will link your records and those of your financial associate(s), including any previous and/or subsequent names. These links will remain on your and their files until you or they tell the agency you are no longer financially linked and the agency accepts this.

The agencies may supply us with credit information, such as previous applications, the conduct of accounts in your and your financial associate's name, any business accounts you have, fraud prevention information and public information such as County Court Judgments, bankruptcies and the Electoral Register.

The identity of the credit reference agencies, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your rights with the credit reference agencies are explained in more detail at <https://www.equifax.co.uk/crain.html>.

When we, credit reference and fraud prevention agencies process personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the products or services you have requested.

#### WHERE WE STORE YOUR INFORMATION

All personal information we have about you is stored on secure servers operated by Arwel's Agri Services Ltd or its third party service providers. Insert any industry security certification – if applicable (e.g. ISO 27001 or Cyber Essentials Plus)

#### HOW LONG WILL WE KEEP PERSONAL INFORMATION ABOUT YOU?

Arwel's Agri Services will keep a copy of your personal information for as long as we have a contractual relationship with you, or from the point of a machine or product purchase, and for a period of 7 years thereafter. For personal information which is not linked to a machine purchase we will keep this for a period of 7 years from the date of the record. All Sales Master quotes will be kept for 12 months from the point of quote.

We may keep your data for longer periods if we cannot delete it for legal, regulatory or technical reasons. Maintaining your personal information for these periods allows us to keep accurate records for our legal obligations and to handle any future complaints.

#### DATA TRANSFERS

Arwel's Agri Services does not transfer your data outside the European Economic Area (EEA). Whenever fraud prevention agencies transfer your personal data outside of the EEA, they impose contractual obligations on the recipients of that information to protect it to the standard required in the EEA.

#### COOKIES

For detailed information on the cookies we use and the purposes for which we use them see the Arwel's Agri Services Cookie Policy on our website.

#### YOUR RIGHTS

You have the following rights in connection with your personal information processed by Arwel's Agri Services.

- **Access** – you can request access to your personal information (and a copy, in a structured, commonly used and machine readable format) and further details about how your personal information is handled by Arwel's Agri Services.
- **OBJECT** – you have the right to object to our processing of your personal information for direct marketing purposes.

- **RECTIFICATION** – you can request rectification of any incorrect personal data held about you.
- **ERASURE** – you can request erasure of any personal data where the processing is based on explicit consent.

You have a right at any time to opt-out or withdraw consent of receiving marketing from us and/or to amend the delivery method we use. We will only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

To manage your rights and delivery preferences please to us at:

Post: Marketing Department, Arwel's Agri Services, Troedrhwi, Harford, Llanwrda, Carm. SA19 8DS Email: info@arwelagri.co.uk.

You can also opt-out from us passing your information to the other businesses listed above.

You can exercise any of these rights at any time by contacting us contacting our Data Protection Officer using the contact details provided above.

If you are concerned or have questions about how Arwel's Agri Services handles your personal data please contact us and we will do our best to assist you. Please note that you have the right to lodge a complaint with the UK Information Commissioner's Office (or any other appropriate supervisory authority), which may be accessed through the following link <https://ico.org.uk/concerns/> .

#### **CHANGES TO OUR PRIVACY POLICY**

Arwel's Agri Services reserve the right to revise this privacy policy or any part of it from time to time. Please check back frequently to see any updates or changes to our privacy policy.