

Pentagon Investments Limited and Group of Companies including:
Lawrence Vehicles Limited (T/A Lothian DAF and Lancashire DAF)
Meadow Group Services Limited
Mertrux Limited
Pentagon Vehicle Rentals Limited

Privacy Policy

We appreciate your interest in our products and services. Your privacy is very important to us. We want you to be confident that the information you give us when using our services is safe and secure. In this Privacy Policy we will explain how we use your personal data to give you a better, more personalised experience.

We'll also tell you how and why we collect your personal information, the partner companies we may share this with, your rights and choices when it comes to these details, as well as the steps we take to keep it secure and confidential.

The purpose of this policy is to ensure that the Pentagon Investments Limited, Group of Companies (*The Group*) and its staff comply with the provisions of the Data Protection Act 1998 and the new General Data Protection Regulations when processing personal data.

This policy and our practices will ensure that trustworthy business relationships are built and the reputation of the Group as a business and an employer is maintained.

The Group aim to be lawful, fair and transparent with personal data and any severe infringement will be treated seriously by the Group and may be considered under disciplinary procedures.

We would like you to use, enjoy and benefit from our products and services without having to compromise your privacy in any way.

Who is collecting the data

Pentagon Investments Limited is the parent company for Lawrence Vehicles Ltd, Mertrux Limited, Pentagon Vehicle Rentals Limited and Meadow Group Services Limited. Personal information is collected in line with the needs of the business.

What data is being collected?

We collect information about you and/or your vehicle when you engage with our website, enquire about our products or services, or with our manufacturing partners. We only collect information which is necessary, relevant and adequate for the purpose you are providing it for.

We will give you the option to receive marketing communications from us. We will never send you unsolicited 'junk' email or communications, or share your data with anyone else who might.

We do not sell your information to third parties, but we do work closely with selected partners who help us to provide you with the information, products and services that you request from us. For example, our Manufacturing partners who provide documentation relating your vehicle.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, we may collect identifying information (not personal information such as your email address) using cookies. Cookies are required as part of this website's operation, and we use traffic log cookies to identify which pages are being used. Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. If you indicate that you do not wish to accept cookies from this website, but you continue to use the website, only those cookies that are essential to the operation of the website will be downloaded. If you prefer not to allow the use of any cookies, you can change the configuration of your browser to either warn you when you receive a cookie, or to automatically reject them. You may find, however, that disabling cookies means certain areas of the website do not function correctly.

What is the legal basis for processing your data? (Why we process your personal information)

We will fairly process your data under the following legal basis.

- Consent
- Contractual necessity
- Compliance with legal obligations
- Vital interest
- Legitimate interests

Consent

If you provide us with your information for processing under Consent, it could be used for; supplying brochures, mailers including information about our products and services, prospecting, quotations for products and services, test drives and surveys. You may withdraw your consent at any time, see contact us at the bottom of this policy.

Contractual

If we have a contract with you, processing is necessary in relation to the contract which you have entered into with us such as but not limited to, Vehicle Sales Quotation, Order/s, taking payment, establish a credit account, Service and Maintenance contracts / extended warranty and to chase payment. We will complete our obligations under this contract to the best of our ability and use you data in an appropriate way.

May 2018

Vital interest

If there are any urgent safety or product recall notices, we will contact you when we reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your vital interests for us to use your personal information in this way.

Legal obligation

We will comply with our legal obligations which include but is not limited to, sharing data with the DVSA, DVLA, Police, HMRC and other government bodies where appropriate to protect ourselves, our employees and customers.

Legitimate interest

We will use your personal data when it is necessary for us to pursue our legitimate interests for our business which are vehicle sales, parts sales, repair and maintenance of vehicles.

- We will maintain our records/systems with personal data and vehicle information to know and understand the history of the relationship.
- We will contact existing customers that purchased a product or service or from us with duty of care reminders (for example service reminders/MOT)
- We will inform our current vehicle customers of our new products within the lifecycle of their current vehicle.
- We will share your personal data with our finance house partners to undertake credit checks with the aim to finance a vehicle purchase.
- Whenever you voluntarily disclose personal information online, for example on message boards, through email, or in chat areas, we may use this information for analytical and marketing purposes.
- We may correspond and communicate with you, for efficiency, accuracy or other improvements to our processes to support your data including customer satisfaction surveys.
- We will recruit (for employment purposes) and process your application fairly.
- For marketing activities (other than where we rely on your consent) send targeted marketing messages via social media and other third party platforms. We will send event invites appropriately.
- We will record parts sales data for Warranty and service history purposes.
- We will administer our websites.
- We will aim for prevention of fraud and other criminal activities.
- We continue to provide purchased goods or services to you such as our loyalty program unless we are instructed otherwise.

If you exercise your rights and ask us not to contact you, we will keep a record of this to comply with your request.

When you telephone us we may record the conversation to ensure the security of any transaction discussed; to help us to review our quality of service, dispute and complaint handling purposes and to assist in the training and development of our employees.

How long will we store your data?

Your personal information will be kept to comply with our obligations under the law and in relation to the interests of our business. Once your relationship with us has ended, (for example, contract expires, warranty ended, we learn that you no longer own a vehicle) we will not keep this information for longer than is necessary.

Where we have obtained your personal information following a request for information, test drive, brochure, quotation or any other information on any of our products or services, we will process your data to allow us an opportunity to form a relationship with you.

Will your data be shared with any third parties?

We work closely with third party service providers to bring you a range of products and services that are complimentary to those that we provide. Where external companies are used to process personal data on behalf of the Group (such as payroll bureaus, pension companies etc), responsibility for the security and appropriate use of that data remains with the Group

Where a third-party data processor is used:

- a data processor will be chosen which provides sufficient guarantees about its security measures to protect the your personal data;
- reasonable steps must be taken that such security measures are in place;
- a written contract establishing what personal data will be processed and for what purpose must be set out;
- a data processing agreement, available from the Human Resources Department / the Group, must be signed by both parties.

When we use third party service providers, we will only disclose to them any personal information that is necessary for them to provide their service. 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.

The use of your personal information is necessary for the legitimate interests of the company in operating and improving its services, analysing the use, and ensuring security. We collect little personal information and we use it in ways that are compatible with your individual rights and freedoms.

Where necessary or required we share information with:

- business associates
- employees
- goods/service providers
- financial organisations
- suppliers
- government offices
- educators and examining bodies
- credit reference agencies
- debt collection and tracing agencies

Or if any of the following conditions arise:

- If required or permitted to do so by law;
- If required to do so by any court, the Financial Conduct Authority or any other applicable regulatory, compliance, governmental or law enforcement agency;
- If necessary in connection with legal proceedings or potential legal proceedings;

What Individual rights do you have?

You already have certain rights under existing data protection legislation, including a right to request a copy of the personal information we hold on you, if you request it in writing. Under GDPR you will have the following rights:

- **Right to be informed:** the right to be informed about the collection and use of personal data.
- **Right of Access:** the right to access their personal data in writing, see below.
- **Right to Rectification:** the right to inaccurate or incomplete data are erased or rectified.
- **Right to correct:** the right to have your personal information rectified if it is inaccurate or incomplete; 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.
- **Right to erase:** the right to request that we delete or remove your personal information from our systems; You have the right to object how we use your information.

- **Right to restrict our use of your information:** the right to 'block' us from using your personal information or limit the way in which we can use it;
- **Right to data portability:** the right to request that we move, copy or transfer your personal information;
- **Right to object:** the right to object to our use of your personal information for marketing including where we use it for our legitimate interests. If you raise an objection we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we're continuing to process your personal information.

We will use reasonable efforts consistent with our legal duty to provide you with your rights in accordance with data protection legislation.

Subject Access Requests

If you are an employee of the Group, you have the right to submit a Subject Access Request. This request will, where reasonably possible, be responded to in 30 days.

Any individual wishing to exercise this right should do so in writing and it will be free of charge. If we feel the request is unreasonable, manifestly unfounded or excessive, we may set a charge or refuse the request.

Individuals will not be entitled to access information to which any of the exemptions in the Act applies. However, only those specific pieces of information to which the exemption applies will be withheld and determining the application of exemptions will be made by the HR director.

If we have removed your data from our systems after you have asked us to remove it or it has expired under our own terms, this will affect future subject access requests.

How can you contact us if you are concerned?

If you think that we have misused your data, would like to withdraw your consent, correct your data and/or you have a complaint, please contact us and we will be happy to assist. You have the right to be removed from our marketing at any point, please just let us know.

If you wish for us to update your information that is inaccurate, please let us know and we will gladly oblige. Our contact details are, the Human Resources Department at;

Pentagon Investments Limited	01332 290290	mydata@pi-trux.co.uk
Meadow Group Services Limited. ICO Ref no. Z7318121	01332 268202	mydata@mgs.co.uk
Lawrence Vehicles Limited T/A Lancashire DAF ICO ref no. Z6390836 Also trading as Lothian DAF Lancashire Truck and Trailer Lothian Truck and Trailer	01772 338111	mydata@lancashiredaf.com mydata@lothiandaf.com mydata@lancashiretruckandtrailer.co.uk mydata@lothiantruckandtrailer.co.uk
Pentagon Vehicle Rentals Ltd ICO ref no. Z4646724	01332 268202	mydata@mgs.co.uk
Mertrux Ltd ICO Ref no. Z5350144	01332 290290	mydata@mertrux.co.uk

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please contact us with the details above or write to the Data Protection Department at Pentagon Investments Limited, 12 Chequers Road, Derby DE21 6EN.

If you're not satisfied with the way any complaint you make in relation to your personal information is handled by us then you may be able to refer your complaint to the relevant data protection regulator. In the UK, this is the

Information Commissioner's Office. Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Telephone number 0303 123 1113

We may, from time to time, make changes to this Privacy Policy. This will reflect any changes to our privacy practices in accordance with updates to legislation, best practice or our service provision. Changes posted on this page will become effective as soon as they are posted.