

**Sovereign Automotive Ltd
Customer Privacy Notice**

Sovereign Automotive Customer Privacy Notice

Registered name: Sovereign Automotive Limited

We are the controller of your personal data. For more information on controllers and their responsibilities please see our guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information.

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- [Where we get personal information from](#)
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CONTACT DETAILS

Post Sovereign Automotive, Marshfield Bank, Crewe, CW2 8UY.

Telephone 01270 500900

Email privacy@kindertons.co.uk

WHAT INFORMATION WE COLLECT, USE, AND WHY

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Gender
- Occupation
- Date of birth
- Third party information (such as family members or other relevant parties)
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Employment details (including salary, sick pay and length of service)
- Credit history and credit reference information
- Health information (such as medical records or health conditions) in line with Article 9(2)(f) in relation to legal claims as well as safeguarding and fraud prevention
- Criminal records data (including driving or other convictions)
- Telematics data and connected car information
- Information relating to compliments or complaints
- Video recordings
- Audio recordings (eg calls)
- Records of meetings and decisions
- Account access information
- Website user information

We also collect or use the following special category information to **provide and improve products and services for clients**. This information is subject to additional protection due to its sensitive nature:

- Health information in line with Article 9(2)(f) in relation to legal claims as well as safeguarding and fraud prevention

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes
- Technical data, including information about browser and operating systems

We also collect or use the following special category information for the **operation of client or customer accounts**. This information is subject to additional protection due to its sensitive nature:

- Health information in line with Article 9(2)(f) in relation to legal claims as well as safeguarding and fraud prevention

We collect or use the following personal information **for the prevention, detection, investigation or prosecution of crimes**:

- Names and contact information
- Client accounts and records
- Video recordings of public areas
- Audio recordings of public areas
- Video recordings of private or staff only areas
- Audio recordings of private or staff only areas
- Call recordings
- Dashcam footage - outside vehicle
- Dashcam footage - inside vehicle
- Financial information eg for fraud prevention or detection
- Location data

We also collect or use the following special category information **for the prevention, detection, investigation or prosecution of crimes**. This information is subject to additional protection due to its sensitive nature:

- Health information in line with Article 9(2)(f) in relation to legal claims as well as safeguarding and fraud prevention

We collect or use the following personal information to **comply with legal requirements**:

- Contact information
- Identification documents
- Client account information
- Health and safety information in line with Article 9(2)(f) in relation to legal claims as well as safeguarding and fraud prevention
- Any other personal information required to comply with legal obligations
- Safeguarding information
- Criminal offence data. Criminal offence data is processed in accordance with Schedule 1, Part 2 of the Data Protection Act 2018, including where necessary for legal claims, preventing fraud, safeguarding and compliance with legal obligations.

LAWFUL BASES AND DATA PROTECTION RIGHTS

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

OUR LAWFUL BASES FOR THE COLLECTION AND USE OF YOUR DATA

Our lawful bases for collecting or using personal information to [provide and improve products and services for clients](#) are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are to investigate, manage and progress road traffic accident claims.

Our lawful bases for collecting or using personal information for the [operation of client or customer accounts](#) are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are to investigate, manage and progress road traffic accident claims.

Our lawful bases for collecting or using personal information **for the prevention, detection, investigation or prosecution of crimes** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are to investigate, manage and progress road traffic accident claims.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are to investigate, manage and progress road traffic accident claims.

Our lawful bases for collecting or using personal information to **protect client welfare** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are to investigate, manage and progress road traffic accident claims.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are to investigate, manage and progress road traffic accident claims.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

WHERE WE GET PERSONAL INFORMATION FROM

- Directly from you
- Regulatory authorities
- CCTV footage or other recordings
- Legal bodies or professionals (such as courts or solicitors)
- Debt collection agencies
- Publicly available sources
- Previous employment
- Credit reference agencies
- Suppliers and service providers
- Third parties:
 - Other third parties as relevant

RETENTION

We retain most personal data for 6 years with any call recordings retained for 3 years. Please contact us for more details about data retention if required.

WHO WE SHARE INFORMATION WITH

Data processors

Data Processor Type	Purpose
Vehicle checks	Provide vehicle specification details
Postcode lookup / address populator	Postcode look up to provide addresses
Industry claim progress portal	Notification & billing of services
ID check providers	ID check
Repair deployment and updates	Instruct repairers and import key dates
Policy details import tool from policyholders	Import customer details / check policy conditions
Motor inspection engineer	Export instructions, import reports and images
Insurance details database	Check third parties insurance details
DVLA records database	Import result and make decisions
Repair estimating software	Used to collate repair estimates
Vehicle tracking supplier	Vehicle movement tracking to aid monitoring
Voice of customer software	Customer feedback activity
Vehicle recovery and movement agents	Vehicle movement and short-term storage
Repair network	Vehicle repair network
Salvage agent	Remove manual touches
SMS supplier	Import SMS response from Customer
Fleet vehicle maintenance provider	Instruct repairs and import updates
Payment card solution provider	Worldpay card payment gateway
Sub hire provider	Export instructions and import hire car data
Fuel card providers	Fuel use tracking
Social media partners	Recover any money owed to Kindertons group
Debt recovery agents	Debt Recovery Agents
Panel solicitors	Conduct litigation linked to Kindertons group claims
Integrations with any data processors	Many of our data processors exchange data via secure integration / API or alternative secure transmission method
Document signing service	Provide signing services
LLM suggestions	Provide case best practice suggestions to be reviewed manually by a user prior to processing
Telephone services	Provide telephony services to allow calls, recordings and transcripts of conversations
Software providers	Provide software services to aid and support claim handling

Others we share personal information with

- Debt collection agencies
- Other financial or fraud investigation authorities
- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Emergency services
- Insolvency practitioners
- Regulatory authorities
- External auditors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Previous employers
- Suppliers and service providers
- Professional consultants
- Third parties:
 - Service providers, Work providers, Insurers, Regulatory bodies, Consultants, External auditors

SHARING INFORMATION OUTSIDE THE UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Category of recipient: Cloud infrastructure and storage

Country the personal information is sent to: USA

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA)

Category of recipient: Outsourced Service Provider

Country the personal information is sent to: South Africa

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA)

Where necessary, our data processors will share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place. For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Various organisations

Category of recipient: Insurers V Service providers V Suppliers

Country the personal information is sent to: Various outside of the UK

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA)

HOW TO COMPLAIN

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>