# T. C. HARRISON GROUP LIMITED TRADING AS T C HARRISON FORD, T C HARRISON KGM, T C HARRISON OMODA, T C HARRISON JAECOO, AND T C HARRISON CHERY PRIVACY POLICY

T. C. Harrison Group Limited, Ford Motor Company, KGM UK Motors Ltd, Omoda & Jaecoo UK Limited, and Chery UK (a trading division of Omoda & Jaecoo UK Limited) are 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 T. C. Harrison Group Limited, Ford Motor Company, KGM UK Motors Ltd, Omoda & Jaecoo UK Limited, and Chery UK and also personal information which is provided to T. C. Harrison Group Limited by third parties.

The data controller in respect of personal information processed under this policy is T. C. Harrison Group Limited (a company incorporated in England with company number 1863311) whose registered office is at Milford House, Mill Street, Bakewell, Derbyshire, DE45 1HH. T. C. Harrison Group Limited is authorised and regulated by the Financial Conduct Authority (Firm reference number: 312522).

T. C. Harrison Group Limited trading names include T C Harrison Ford, T C Harrison KGM, T C Harrison Omoda, T C Harrison Jaecoo, T C Harrison Chery, and T C Harrison JCB. T. C. Harrison Group Limited has two trading subsidiaries, T.C. Harrison 1960 Limited (a company incorporated in England with company number 0648847 whose trading names include TCH Leasing, TCH Salsa, TCH Concerto, iCarLease, iVanLease, and Milford Leasing), and Gunn JCB Limited (a company incorporated in England with a company number 00527818 whose trading names include Gunn JCB Compact, Gunn JCB Groundcare, Gunn JCB Industrial, and Gunn JCB Landpower).

We have a Compliance Officer who you can contact on 01629 816000 or via email to datacompliance@tchgroup.co.uk should you have any comments or queries in relation to this policy or T. C. Harrison Group Limited's use of your personal information.

## WHY DO WE COLLECT PERSONAL INFORMATION ABOUT YOU?

T. C. Harrison Group Limited 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?

T. C. Harrison Group Limited collects the following types of personal information from you:

- Name
- Date of Birth
- Address and address history
- Nationality
- Contact details such as email address and telephone number
- Financial information and credit history
- Employment details
- Information required to assess any potential vulnerability
- 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 general usage and the location of your vehicle and/or machine
- Your customer satisfaction information
- Personal data associated with vehicle repair and breakdown.

## HOW DO WE RECEIVE PERSONAL INFORMATION ABOUT YOU?

T. C. Harrison Group Limited receives personal information about you:

- When you contact us directly in person, by telephone or email, when you visit our website (www.tch.co.uk) and/or complete any online forms, online chat, online vehicle reservations, or use our social media channels, whether to apply for one of our products or services or to make an enquiry or any other request. Our Site may contain links to other websites and may use cookies to make your online journey more efficient. Please note that we are not responsible for the privacy practices of such other websites and advise you to read the privacy statements of each website you visit which collects personal data. Please be aware that communications over the internet, such as emails, are not secure unless they are encrypted. We do not accept any responsibility for any unauthorised access or loss of personal data beyond our control.

- As an authorised dealer of Ford Motor Company, KGM UK Motors Ltd, Omoda & Jaecoo UK Limited, and Chery UK.
- 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.

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

T. C. Harrison Group Limited and its group may use your personal information for the following purposes:

- To verify your identity and to identify you when you contact us.
- To assess your access, communication and/or personal vulnerability requirements to help us to support you better through the process of your vehicle purchase.
- 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 prevent fraud and money laundering.
- To help administer, and contact you about improved administration of, any accounts, services, and products we have provided before, now or in the future.
- To recover debts that you owe and trace your whereabouts.
- 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.
- For referral to third party affiliates but only whose services are deemed to be appropriate to your needs
- To enable our dealerships to assist you in applying to our manufacturer partners to grant you access to, or creating an account for, their systems or apps.

Any personal data provided to any applicable third parties, or for the purpose of finance/insurance, will be processed in accordance with their Privacy Policy. Please refer to the Privacy Policy of the individual organisation for details on how your personal data is processed (further details can be provided on request).

**THE LAWFUL GROUNDS THAT WILL BE RELIED UPON WHEN YOUR PERSONAL INFORMATION IS USED**

There are different lawful grounds that we rely on to use your personal information, and we will collect and use your personal information in the following situations:

- where our use of your personal information is necessary to perform a contract or contracts that you are a party to, or to take steps that you request before entering a contract. These contracts could include the conditions on which you enter a competition, or agreements you enter into for service products, for example;
- where our use of your personal information is within our legitimate interests or the legitimate interests of the organisation with which we have shared your personal information and we have made sure that your personal information, and your rights in relation to that information, are protected. For example, we may rely on this legal ground if we use your personal information to: understand and improve our products, services and/or business or marketing strategies; for research purposes; to manage and improve our relationship with you and for administrative purposes; to help find out what information, products and services are most likely to interest you and to send or show you information, offers, and online advertisements for these products or services; to personalise your experience of our products and services; to ensure that our products and services are delivered and used in accordance with the law and the terms and conditions that apply to them; and where necessary to protect or defend our or another's rights or property, or to detect, prevent, or otherwise address fraud, security, safety or privacy issues;
- where we believe it is necessary to use your personal information to comply with a legal or regulatory obligation.
- in limited circumstances where we believe it is necessary to protect someone's safety or vital interests.
- Under the Data Use and Access Act 2025 we may process data for specific recognised legitimate interests. This is where a balancing test is not required as processing is in the public interest. This may be where processing the data will help to detect or prevent crime, such as aiding a public authority to carry out their duties following the receipt of a written request. Processing under recognised legitimate interests will only be completed when it is strictly necessary for this purpose.
- where we have your consent. We will rely on your consent to, for example, use your personal information for marketing to you by telephone, postal mail, email, and text message. Where we rely on consent to use your personal information, you have the right to withdraw that consent at any time. Please see the 'Your rights' section of this notice for more details.

Our manufacturer and other designated partners may also combine and analyse your personal information to help develop and improve products and services, to understand customers' needs better, and to manage and improve our relationship with you. This could include, for example, analysing vehicle diagnostic information, conducting recalls, informing distribution strategy, evaluating the effectiveness of marketing and customer service, conducting market analysis and identifying products or services which may be of interest to you, and contacting you to tell you about such products and services.

We would like to make sure the communications sent to you and interactions with you are as relevant as possible. As a result, from time to time, we may use information about you collected from third parties to help determine what manufacturer and/or designated partner's products and services you might be interested in. We may then send you information about those products and services in accordance with your communication preferences and use the information we hold about you to inform customer service centres if you contact them. We may also work with third parties to show you tailored advertising on social media platforms or, if you have consented to the use of cookies, when you browse the internet/visit other websites (please see manufacturer cookie guides for more information).

Your information will be treated in accordance with UK law concerning data protection and may be transferred within the European Union ("EU")/European Economic Area ("EEA"), as well as to countries outside the EU/EEA (including the USA). Our manufacturer partners will take reasonable steps to ensure that your personal information is adequately protected should it be transferred to countries outside the EU/EEA, please refer to their individual Privacy Policies for more information.

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

T. C. Harrison Group Limited will provide your personal information to:

- Ford Motor Company if you are acquiring or are interested in acquiring Ford products.
- KGM UK Motors Ltd if you are acquiring or are interested in acquiring KGM products.
- Omoda & Jaecoo UK Limited if you are interested in acquiring Omoda, Jaecoo, or Chery products.
- Affiliated manufacturers or service providers, if you are acquiring or are interested in acquiring their products/services.
- Financial services providers, such as our preferred suppliers of finance facilities Ford Credit, ALD Automotive (Ford Lease), Creation Finance (Omoda, Jaecoo, and Chery), CA Auto Finance (KGM), Motonovo Finance, Mann Island Finance, Santander, Evolution Funding, and Bumper International Ltd. Your personal data may be shared with financial services organisations, such as companies which provide hire-purchase funding and banks providing such funding. This is for the purpose of securing such funding on your behalf. We may provide personal data to enable such financial services organisations to carry out necessary searches to enable them to make a funding decision for you and meeting their legal and regulatory requirements. In addition, these funders may share your data within their group of companies who provide services to them and so that they and any other companies in their group can look after your relationship with us and them.
- With your specific consent, information and outcomes on our assessment of your access, communications and/or vulnerability status will be shared with specific third parties where there is a legitimate interest to do so. All information gathered will be treated with extreme confidentiality and for the sole purpose of improving your purchase experience.
- Insurance providers as determined by your specific Needs and Circumstances
- Mechanical breakdown services advised to you at the time of vehicle purchase or service/repair.
- Vehicle service plan providers
- Paint protection service providers
- Carefully selected marketing service/research partners.
- Third party debt collection agencies, insolvency practitioners and legal advisors.
- Our service providers who perform services on our behalf, such as banking services and data management firms, external auditors, and accountants.
- Regulatory authorities.

This Privacy Policy only applies to the collection and use of your personal data provided to us and not to personal data you may provide directly to third parties. Any third parties will have their own policies in respect of processing personal data you provide to them and/or your personal data that we may disclose to them in accordance with this Privacy Policy.

**WHERE WE STORE YOUR INFORMATION**

All personal information we have about you is stored on secure servers operated by T. C. Harrison Group Limited or its third-party service providers.

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

T. C. Harrison Group Limited 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 vehicle or product purchase, and for a period of 10 years thereafter. For personal information which is not linked to a vehicle purchase we will keep this for a minimum period of 3 years from the date of the record.

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 queries or complaints.

**DATA TRANSFERS**

Whenever T. C. Harrison Group Limited transfers your data outside the European Economic Area (EEA) we 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 T. C. Harrison Group Limited Cookie Policy on our website.

**YOUR RIGHTS**

You have the following rights in connection with your personal information processed by T. C. Harrison Group Limited:

- **ACCESS** – you can request access to your personal information and further details about how your personal information is handled by T. C. Harrison Group Limited.
- **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 to receiving marketing from us and/or to amend the delivery method we use. We will only use your personal information to send you marketing information 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 follow the instructions in our marketing communications, enquiry forms, or write to us at: Marketing Department, T. C. Harrison Group Limited, Stadium View, Pride Park, Derby, DE24 8JH, or alternatively via email at: marketing@tch.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 or contacting our Compliance Officer using the contact details provided above.

**COMPLAINTS**

If you are concerned or have questions about how T. C. Harrison Group Limited handles your personal data, you may raise a complaint by contacting complaints@tch.co.uk. We will acknowledge receipt of your complaint within 30 days and provide a full response without undue delay. Please note that you have the right to escalate your complaint with the UK Information Commissioner's Office, which may be accessed through the following link https://ico.org.uk/concerns/.

**OTHER IMPORTANT TERMS**

If a court finds part of this Privacy Policy illegal or invalid, the rest will continue in force. Each of the Conditions, and each paragraph of each Condition, operates separately. If any court or relevant authority decides that any of them are unlawful, the remaining parts will remain in full force and effect.

If we do not insist immediately that you do anything you are required to do under this Privacy Policy, or if we delay in taking steps against you in respect of your breaching this Privacy Policy, that will not mean that you do not have to do those things and it will not prevent us from taking action against you at a later date.

**GOVERNING LAW AND JURISDICTION**

This Privacy Policy and any dispute or claim arising out of or in connection with it or its subject matter will be governed by and construed in accordance with the laws of England and Wales.

The parties irrevocably agree that the courts of England will have exclusive jurisdiction to settle any dispute or claim that arises out of or in connection with this Privacy Policy or its subject matter.

**CHANGES TO OUR PRIVACY POLICY**

T. C. Harrison Group Limited 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.

**DATA PROVIDED TO FORD MOTOR COMPANY**

When Ford vehicles are manufactured, they are assigned a unique number (the Vehicle Identification Number, or VIN). From the VIN we can tell certain information about your vehicle, including its model, age, the software it uses, and its technical specifications.

In order to diagnose, analyse, repair or service your vehicle, the technicians working on it will need to collect the VIN together with certain diagnostic information and information about the current state of your vehicle (for example, what software versions it is using, its mileage etc.).

This information will be transferred to a system run by Ford so that the technicians working on your vehicle can be provided with vehicle-specific repair, maintenance and diagnostic information (such as wiring diagrams, vehicle software updates) and information about any past work carried out on the vehicle to assist them to diagnose, repair and/or service it and to enable them to maintain their records.

To make sure the vehicle has a comprehensive diagnosis record, information about what work is done to your vehicle when it is serviced or repaired will be linked to the VIN of the vehicle. This will be transferred to the system and stored so that Ford (or any third parties it authorises to use the system in this way) can make information about past repair or service available to any dealer or repairer anywhere in the world who needs to repair or service your vehicle.

The information held on the system is also used by Ford to enable the diagnosis and repair of your vehicle, to manage and administer warranties and similar products and services, for product safety, research and development purposes, and to enable Ford to comply with its legal obligations.

In addition to the transfers of information described above, Ford may also pass your information to:

- companies in the Ford Corporate Group for the purposes of research and development and analytics; and/or
- to companies in the Ford Corporate Group and/or third parties where Ford Motor Company believes this is necessary to comply with a legal or regulatory obligation, or otherwise to protect the rights of Ford, other companies in the Ford Motor Company Corporate Group, or the rights of any third party.

Given the global nature of the system, VIN information is transferred to countries outside the European Economic Area by Ford.

Details of how Ford Motor Company use information regarding customers and prospective customers can be found at https://www.ford.co.uk/useful-information/terms-and-privacy.

If you have any questions, or would like to access the information about your VIN held in the system, please contact Ford at:

Privacy Enquiry or email: dpeurope@ford.com
PO Box 616
Hull
HU9 9PR

**DATA PROVIDED TO KGM UK MOTORS LTD**

Data will be provided to KGM UK Motors Ltd for the purpose of assisting with the purchase (and ongoing maintenance) of their products and services.

Upon purchase of a KGM product or service, your name, address, telephone numbers, email address, and VIN will be shared with them.

KGM UK Motors Ltd is part of a global company who operate internationally. Details of how they use information regarding customers and prospective customers can be found at https://www.kgm-motors.co.uk/privacy-policy/.

If you have any questions, or would like to access the information held about you in their system, please contact KGM at:

Compliance or email customerservices@kgm-motors.co.uk
Customer Services
KGM UK Motors Ltd
G Offices
Europa Industrial Park
Parsonage Road
Swindon
SN3 4ND

**DATA PROVIDED TO OMODA & JAECOO UK LIMITED**

Data will be provided to Omoda & Jaecoo UK Limited for the purpose of assisting enquiry made about, or with the purchase (and ongoing maintenance) of, their products and services.

Upon enquiry or purchase of an Omoda, Jaecoo, or Chery product or service, your name, address, telephone numbers, email address, and VIN will be shared with them.

Omoda & Jaecoo UK Limited is part of a global company who operate internationally. Details of how they use information regarding customers and prospective customers can be found at https://omodaauto.co.uk/privacy-policy/.

If you have any questions, or would like to access the information held about you in their system, please contact Omoda & Jaecoo at: privacy@omodaauto.co.uk.