



Data Protection Notice

The protection of your personal data is important to us. Any references to data in this notice refer to your personal data i.e. any information that may directly or indirectly identify you. The following paragraphs provide information about what we do with your data, in particular how we use your data and with whom we share your data. We are obliged to provide this information under the EU General Data Protection Regulation (GDPR).

Please read the following information carefully.

Who are we?

Vauxhall Finance plc ('Vauxhall Finance', also referred to in this Notice as 'we' or 'us') is the data controller of your data. Vauxhall Finance's registered address is Vauxhall Finance plc, Heol-y-Gamlas, Parc Nantgarw, Treforest, Cardiff, CF15 7QU. We are part of the Opel Bank S.A. group of companies.

Our data protection officer

Please address any communication for the attention of our data protection officer to: Data Protection Officer, Vauxhall Finance plc, Heol-y-Gamlas, Parc Nantgarw, Treforest, Cardiff, CF15 7QU.

You can also contact the data protection officer by phone on 0344 871 2222, or by email at ukdataprotection@ov-fin.com

Where do we obtain your data from?

We obtain data directly from you when you register for a training course, or from a third party (such as your employer) if they registered you on your behalf. This data includes such details as your name, date of birth, employer details, business email address, and business telephone number. You may choose to not supply us with your data, but this may result in us not being able to provide training to you. We may also collect data throughout the duration of the training course (e.g. we will keep a record of the results of any assessments you take part in, and we may record any Webex or other training that you take part in).

Why do we process your data?

We process your data in order to be able to provide the training services that you have requested from us. By providing us with your details you agree to the use of your data for this purpose. This will include:

- completing your registration for the training course and issuing you with relevant details and course materials;
- undertaking assessments of your performance;
- issuing certificates and qualifications; and
- performing any other administration necessary to deliver the training course.

We also process your data where it is necessary to do so for our legitimate interests. A legitimate interest is where we have a business or commercial reason to process your data, without it being unfair to your rights or best interests. We process your data for the following legitimate business purposes:

- ensuring proper management controls and the requisite level of training is being provided;
- for internal or external audit purposes;
- developing and improving our products and services; and
- for marketing purposes, where permitted by applicable law.

We may also process your data to comply with legal, regulatory and other governance obligations that apply to us, e.g. our obligation to prevent and report fraud or other criminal acts.

Our other group companies may also process your data for the following purposes: internal or external audits, accounting, and to identify or avoid fraud or other criminal acts.

With whom do we share your data?

We will share your data with our employees who require such access in order to provide the training services and to fulfil our contractual duties. We may share your data with IMI Awarding (for certification purposes). You can view the IMI privacy notice here: <https://www.theimi.org.uk/agenda/privacy-policy>. We may share your data with Raytheon Professional Services, who supply the training services to the Vauxhall network. We may also share your results with your employer.

We may share your data with other companies in the Opel Bank S.A. group, with Vauxhall Motors Limited, and with companies that help us to run our business (e.g. providers of IT services). We may also share your data with regulatory authorities, courts and tribunals, government agencies and law enforcement agencies (such as the police), where required to do so.

Sending data outside of the European Economic Area (EEA)

We may share your data with recipients outside the EEA, such as the USA and India. If we do then we will make sure that it is protected in the same way as if it was being processed in the EEA.

Some countries or territories outside the EEA do not have an adequate level of data protection corresponding to the UK level of data protection. In order to protect your data and to achieve an adequate level of protection for your personal data when we transfer it to one of these countries or territories, we will ensure that one or more of the following safeguards are put in place:

- The organisation we transfer the data to may be part of Privacy Shield. This is a framework that sets standards for the transfer of data between the USA and EU countries. It makes sure those standards are similar to those used within the EEA.
- Your data may be transferred to a non-EEA country with privacy laws that give the same protection as the EEA.
- We may put in place a contract with the recipient that means they must protect your data to the same standards as within the EEA. This contract may be in the form of the standard EU contractual clauses which have been approved by the European Commission.

You can learn more about this at the European Commission website here: https://ec.europa.eu/info/law/law-topic/data-protection_en

You can also contact our Data Protection Officer if you would like further information, using the details above.

How long do we keep your personal data?

We will keep your personal data for as long as required to meet our responsibilities in connection with your training course. When the training course has ended we may keep your data as long as necessary for the following reasons:

- to enable us to respond to any questions or complaints that you may have; and
- as long as the IMI require us to do so to evidence your attendance and performance during the training course, but no longer than is necessary.

We may need to retain your data for longer if we are unable to delete the data for legal, regulatory or technical reasons. If this is the case we will ensure that your privacy is protected.

Your Rights

You may have the following rights in relation to your data:

- **Right of access** – you have a right to request access to your personal data and to certain information about the processing of that personal data. This information must usually be provided to you free of charge within a month of receiving your request.
- **Right of rectification (correction)** – you have the right to ask for your personal data to be corrected if it is inaccurate, and completed if it is incomplete.
- **Right to be forgotten** – in certain circumstances you can ask us to erase your personal data. It's unlikely to be possible to accept your request if, for example, we have a contractual or other legal duty to retain your information.
- **Right to restriction of processing** – in certain circumstances you have a right to restrict the processing of your personal data. This may include when you dispute its accuracy (until the accuracy is proved); if you have objected to the processing (when it was necessary for our legitimate interests) and we are considering whether our legitimate interests override your own; or if we no longer need the data but you need us to keep it in order to establish, exercise or defend a legal claim.
- **Right of portability** – in certain circumstances, you have the right to move, copy or transfer your data to another data controller or to yourself. This right is only relevant if the data is being processed on the basis of consent or for the performance of a contract, and the processing is carried out by automatic means. This right is different from the right of access, and the types of information you can get under the two separate rights may be different.
- **Right to object** – in certain circumstances, you have the right to object to the processing of your data when we are doing so on the basis of our legitimate interests. We must stop processing the data unless we can show that our legitimate interests override your own, or if the processing is necessary for legal reasons. You have an absolute right to object to the processing of your data for direct marketing purposes. If you object to us processing your data for direct marketing purposes, you will need to notify us, and we must accept your request and stop the processing as soon as we receive your objection.

In order to assert any of the above rights, please feel free to contact our data protection officer using the contact details specified above.

In addition, you have the right to lodge a complaint in relation to our processing of your data with the supervisory authority, the Information Commissioner (ico.org.uk).