

HEDIN AUTOMOTIVE LONDON LIMITED

Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK data protection laws. You can read more about UK data protection laws on the UK Data Regulator's [website](#) (The UK Data Regulator is The Information Commissioner's Office or ICO).

About us

We are part of the Hedin Mobility Group, Europe's largest dealership network, and we offer a complete range of Mercedes-Benz passenger cars, Mercedes-Benz light commercial vehicles, and smart cars to our customers via four locations across South London in Weybridge, Croydon, Dartford and West Bromley.

We sell new, used and commercial vehicles and offer financing and insurance solutions and a full range of aftermarket services to our customers.

You can find further details of the services we offer on our [website](#).

You can find further information on how Hedin Mobility Group, Mercedes-Benz Group AG and smart Europe GmbH may use your personal data in their respective customer privacy notices, via the following links:

<https://hedinmobilitygroup.com/sv-se>.

<https://group.mercedes-benz.com/en/>

<https://uk.smart.com/en/>

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	means Hedin Automotive London Limited. Our company registered number is 14316359;
Our contact details	For any data protection related matter please contact: <ul style="list-style-type: none">• by email to datacompliance@hedinautomotive.co.uk;• by post to: Data Protection Co-Ordinator, Mercedes-Benz of Brooklands, Brooklands Drive, Weybridge, Surrey KT13 0SL.

Personal data	means any information relating to an identified or identifiable individual.
Special category personal data	means personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic data, biometric data (where used for identification purposes), data concerning health, sex life, sexual orientation or criminal records.
Data subject	means the individual who the personal data relates to.

Personal data we collect about you.

The personal data we collect about you depends on the particular products and services we provide to you. The personal data that we collect and use may include:

- your name and contact information, including email address, billing address, delivery address and telephone number and company details (if you are purchasing through a company) (**'Contact data'**);
- information to check and verify your identity, e.g. your date of birth or other personal data provided in the identity documents that you provide to us (**'Identity data'**);
- your purchase history or details of your enquiry (including telephone call recordings) or interest or preferences about our products or services, such as possible planned purchase or lease date, vehicle(s) brand, make and/or model, or vehicle requirements (**'Purchase data'**);
- the registration number, brand, make and model of your vehicle (**'Vehicle data'**);
- the details and verification of your driving licence (including carrying out appropriate checks with DVLA) to verify your eligibility to legally drive vehicles and to meet the requirements of our insurers (**'Driver data'**);
- your image, actions and location if you are recorded on CCTV that we operate on and around our sites (**'CCTV data'**);
- details about any marketing consents and marketing preferences (**'Marketing preferences'**);
- demographic information (including your age range, employment status, marital status and household composition) (**'Demographic Data'**);
- your billing information, transaction and payment card information (**'Billing Data'**);
- your personal or professional interests (**'Interests Data'**);
- information from social media accounts e.g. Facebook (**'Social Media data'**);
- information to enable us to undertake credit or other financial checks on you (**'Credit check data'**);

- information about how you use our website, IT, communication and other systems, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website (**'Website data'**);
- we collect telematics data about your location, direction, speed, journey and other relevant driving information whenever we carry out a diagnostics test or a service on your vehicle or if we provide you with a courtesy or demonstration vehicle (**'Telematics data'**);
- your responses to surveys, competitions and promotions (**'Survey Data'**).

We collect and use this personal data for the purposes described in the section **'How and why we use your personal data'** below. If you do not provide personal data we ask for, it may delay or prevent us from providing products and services to you.

How your personal data is collected.

We collect most of this personal data directly from you—in person, by telephone, text or email, via our website or through our advertisements that may be on third party websites.

We may also collect information:

- from publicly accessible sources, e.g. Companies House or HM Land Registry;
- directly from a third party, e.g.:
 - sanctions screening providers;
 - credit reference agencies;
 - data from third party marketing services;
 - customer due diligence providers.
- from a third party with your consent, e.g. your bank or building society.
- from cookies on our website—for more information on our use of cookies, please see our cookie policy on our website. <https://hedinautomotive.co.uk>
- via our IT systems, e.g.:
 - from door entry systems and reception logs;
 - through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

In addition, we may combine your personal data with other data held by third parties (such as vehicle and value data to allow us to provide vehicle valuation services).

How and why we use your personal data.

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests.

The table below summarises what we use your personal data for and why.

Why we are processing the personal data.	The personal data that we are processing.	The lawful basis that we are relying on.
<p>To provide our products and services to you, we may use your personal data to:</p> <ul style="list-style-type: none"> • deliver goods or services; • to correspond and manage our relationship with you; • to keep you informed about our products and services; • to provide you with important reminders including when your vehicle needs a service and when you need to make a decision about your vehicle lease/finance; • to analyse how our customers want to interact with us. 	<ul style="list-style-type: none"> • Contact data; • Identity data; • Purchase data; • Vehicle data; • Driver data; • Marketing preferences; • Demographic data; • Billing data; • Interests data; • Social media data; • Credit check data; • Website data; • Telematics data; • Survey data. 	<ul style="list-style-type: none"> • To perform our contract with you. • Our legitimate interests to take steps at your request before our contract with you. • Consent (for marketing activities when required).
<p>We may use your personal data specifically for legal reasons:</p> <ul style="list-style-type: none"> • when required by applicable law; • to respond to legal proceedings; 	<ul style="list-style-type: none"> • Contact data; • Identity data; • Purchase data; • Vehicle data; • Driver data; 	<ul style="list-style-type: none"> • Our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us; • To comply with our legal obligations.

<ul style="list-style-type: none"> • to respond to a request from a law enforcement agency; • to protect our rights including for our safety; • to enforce our legal rights including to recover debts owed to us. 	<ul style="list-style-type: none"> • CCTV data; • Billing data; • Credit check data; • Telematics data. 	
<p>We may use your personal data for our own business operations including for:</p> <ul style="list-style-type: none"> • managing our business capability; • providing staff training; • our management accounts and general financial information • our communications, • quality control; • our corporate governance, planning and audit; • Statutory returns. 	<ul style="list-style-type: none"> • Purchase data; • Demographic data; • Billing data; • Website data; • Survey data. 	<ul style="list-style-type: none"> • Our legitimate interests to help with the management of our business. • To comply with our legal and regulatory obligations
<p>We may use and share your personal data for changes in our business. This will include sharing your data with third parties that will or may take control or ownership of some or all of our business.</p>	<ul style="list-style-type: none"> • Purchase data; • Vehicle data; • Driver data; • Marketing preferences; • Demographic data; • Billing data; • Interests data; • Social media data; • Credit check data; • Website data; • Telematics data; 	<ul style="list-style-type: none"> • Our legitimate interests.

	<ul style="list-style-type: none"> • Survey data. 	
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How and why we use your personal data and how long we keep it for – detailed description

If you would like to find more detailed information about the data we process, how and why we process it and how long we keep it for, see the separate document on the website '**Privacy Policy- How, Why and How long we keep your data**'.

How and why we use your personal data—Special category personal data

We do not usually collect any special category personal data about you, except for:

- any driving or motoring offences revealed from a check of your driving licence;
- for customers with a disability who are seeking to purchase a vehicle supplied by us with the benefit of zero-rated VAT relief (or any other tax benefits), we may require proof of your eligibility (including appropriate medical information) to process the benefit(s) or otherwise to process the transaction in accordance with the scheme rules, any relevant guidance and recognised best practice.

How and why we use your personal data—sharing

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We may contact you by targeted advertising that is delivered through social media by using your personal information or use your personal information to help us identify other people that may be interested in our products or services.

We may also work with selected partners to display relevant online advertisements for you and our other customers on third party websites and social media platforms.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**') however we generally only provide you with updates about our products and services when you have **consented** for us to do so.

You always have the right to opt out of receiving marketing communications at any time by:

- contacting us at unsubscribe@hedinautomotive.co.uk; please specify which communication method you wish to opt of (email/text) or all communication methods.
- using 'STOP' in texts from our 3rd party marketing company partners. This will stop SMS text messages from the marketing company sending them.

Please allow up to 28 days for your unsubscribe to take effect.

When you contact us we will often ask to check that the details that we hold about you are correct and this may include checking whether you are happy with the marketing preferences that you have previously provided.

We will always treat your personal data with the utmost respect and never sell it to other organisations for marketing purposes.

Who we share your personal data with

We routinely share personal data with:

- Hedin Automotive London Ltd retailers;
- companies within the Hedin Mobility Group;
- Mercedes-Benz Group AG and Mercedes-Benz UK Limited;
- smart Europe GmbH and smart UK Automotive Ltd;
- the manufacturer or distributor of the vehicle brand that you have purchased;
- our accredited vehicle finance and insurance partners;
- third parties we use to help deliver our products and services to you, e.g. payment service providers, warehouses and delivery companies;
- other third parties we use to help us run our business, e.g. marketing agencies, website hosts or IT suppliers;
- our customer service providers and chat providers on our website;
- Google and Meta who provide the digital channels we use to provide you and other potential customers with tailored marketing;
- Google and Hotjar which analyse the use of our website and therefore have access to your personal data if you use our website;
- third parties approved by you, e.g. social media sites you choose to link your account to or third-party payment providers;
- credit reference agencies;
- our insurers and brokers;
- our banks.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our auditors, e.g., in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;

- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

Who we share your personal data with—further information.

If you would like more information about who we share our data with and why, please contact us (see **'How to contact us'** below).

Where your personal data is held

Personal data may be held at our offices and those of our third-party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal data with'**).

Some of these third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens, see below: **'Transferring your personal data out of the UK and EEA'**.

How long your personal data will be kept

We will keep your personal data for as long as is reasonably necessary for the purposes for which it was collected. If you would like more information about how long we keep your personal data for, please see the separate document on the website **'Privacy Policy- How, Why and How long we keep your data'**.

In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings with us.

When your personal data is no longer required we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

Transferring your personal data out of the UK and EEA

Your personal data may be transferred to, stored, or otherwise processed in countries outside of the UK and European Economic Area ('EEA'). This may happen where a manufacturer, supplier or service provider is located outside of the UK/EEA.

We share your personal data with the Hedin Mobility Group, Mercedes-Benz Group AG and smart Europe GmbH, who will continue to process your personal data as separate personal data controllers. This will involve transferring your data outside the UK. You can find further information on how Hedin Mobility Group, Mercedes-Benz Group AG and smart Europe GmbH may use your personal data by consulting their respective customer privacy notices, via the following links:

<https://hedinmobilitygroup.com/sv-se>.

<https://group.mercedes-benz.com/en/>

<https://uk.smart.com/en/>

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

As a general rule, we and the bodies with which we share your personal data process your personal data only within the EU/EEA. The following exceptions apply, however:

- When you use our website or make a purchase from our online store, we use Google, Meta and Hotjar services to improve our services. Your personal data is transferred to the USA if you give consent for this personal data processing. We have anonymised personal data as much as possible to avoid your personal data being processed outside of the UK.
- In certain cases, it is necessary for our contracted IT service providers to process and transfer your personal data outside of the UK according to our instructions.

We shall ensure that adequate safeguards are in place when transferring personal data outside the EEA. These steps include imposing contractual obligations on the recipient of your personal data or ensuring that the recipient is subscribed to recognised international frameworks for the protection of your personal data.

If you would like further information about data transferred outside the UK/EEA, please contact our Data Protection Co-Ordinator at datacompliance@hedinautomotive.co.uk

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data

Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consent	If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time You may withdraw consent by the mechanisms stated in the Marketing section above. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

For more information on each of those rights, including the circumstances in which they apply, please contact us or see [the guidance from the UK Information Commissioner's Office \(ICO\)](#).

If you would like to exercise any of those rights, please email or write to us (our contact information is provided on the first page of this policy); and

- provide enough information to identify yourself and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being lost accidentally, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (our contact information is provided on the first page of this policy). We hope we will be able to resolve any issues you may have.

You may also have the right to lodge a complaint with the [Information Commissioner](#) (the UK data protection regulator).

Changes to this privacy policy

This privacy policy was last updated on 25th June 2024.

How to contact us

You can contact us and/or our Data Protection Co-Ordinator by post or email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Contact details are shown on the first page of this policy.