

OAK GROUP HOLDINGS LIMITED PRIVACY NOTICE

Oak Group Holdings Limited and its affiliates (referred to as “Oak Tyres”, “we”, “us”, and/or “our”) takes its data protection and privacy responsibilities seriously. This privacy notice explains how we collect, use and share personal information in the course of our business activities, including:

- What personal information we collect and when and why we use it.
- How we share personal information within Oak Tyres and with our service providers, regulators and other third parties
- Explaining more about Direct Marketing
- Transferring personal information globally
- How we protect and store personal information
- Legal rights available to help manage your privacy
- How you can contact us for more support

We may amend this notice from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this notice.

You might find external links to third party websites on our website. This privacy notice does not apply to your use of a third party site.

Important information about OakTyres:

The Oak Tyres entity responsible for your personal information will be the member of Oak Tyres that originally collects information from or about you. For the purposes of this privacy notice that will be either Oak Tyres UK Limited, Davanti World Limited and Davanti Tyres Limited.

You can find out more about Oak Tyres or by contacting us using the information in the [contact us](#) section.

WHAT PERSONAL INFORMATION WE COLLECT AND WHEN AND WHY WE USE IT

In this section you can find out more about

- when we collect personal information
- the types of personal information we collect
- how we use personal information
- the legal basis for using personal information

When we collect information

We collect information about you if you:

- use one of our website(s) or set up a business account with us;
- purchase our goods and services;
- contact us by post, telephone, fax, email or SMS;
- attend a trade show, event or conference where we are present; or
- visit our premises.

The types of personal information we collect

Depending on the purpose for which we use your data, we may collect, store and use certain personal information that is disclosed to us including your name, status, date of birth, address, telephone, mobile and fax number, email address and details of your vehicle, the purchases made and payment details. As and where required, such information may also include photographic identification and proof of address.

We may receive information about you from third parties (such as credit reference agencies) who are legally entitled to disclose that information. We may also collect details of your computer's or device's internet protocol address which will be automatically collected by our web server. With the use of cookies we may collect information relating to when and how you visit and use our Websites and services.

We operate Closed Circuit television (CCTV) systems on our sites and around the perimeter of the same. This includes CCTV recording of external site areas covering walkways, roads and other public areas. To run the processes set out above, we process images of you. This may also capture vehicle registration information.

Telephone calls to Oak Tyres may be recorded as part of our customer service policy and for training purposes.

How we use your information and what is the legal basis for our use of your information

In relation to the information we collect from/about you as described above, we will use that information for the following purposes (as appropriate):

How we use your information	What is the legal basis for our use of your information
To fulfill your order and any other contractual agreements between us.	Our use of your personal information is necessary to perform a contract with you.
To provide you with an acknowledgement of order message and an order confirmation.	Our use of your personal information is necessary to perform a contract with you.
To contact you in connection with the service, to advise of any problems or issues or to arrange any refund (if required).	Our use of your personal information is necessary to perform a contract with you. In other circumstances, we may be required to use your information in this way in order to satisfy our legitimate interest as a commercial organisation.
To send you periodic communications from us (this may include communications by post, e-mail, telephone, text message, picture messaging, fax and SMS), about features, products and services, events and special offers. Such communications from us may include advertising we send out on behalf of third party companies or organisations. Such communications may be based on use of your vehicle and registration details, or based on what you have liked in the past.	In certain circumstances we will use your information in this way where you have provided your consent to us using the personal information. In other circumstances we may be required to use your information in this way in order to satisfy our legitimate interest as a commercial organisation. We will at all times respect your preferences in relation to any direct marketing activity which we undertake.
Market research, including statistical analysis of user behaviour which we may disclose to third parties in depersonalised, aggregated form.	Our use of your personal information is in our legitimate interest as a commercial organisation.
To provide you with a personalised browsing experience when using the Websites.	Our use of your personal information is in our legitimate interest as a commercial organisation.
To provide you with advertisements which are more relevant to you and your interests when	Our use of your personal information is in our legitimate interest as a commercial organisation.

using the Websites.	
To enable us to monitor and improve the performance of the Websites and to improve campaign performance on the Websites	Our use of your personal information is in our legitimate interest as a commercial organisation.
In order to enable us to comply with any legal or regulatory requirements.	Our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have.
For our business and accounting records.	Our use of your personal information is in our legitimate interest as a commercial organisation.
For our employee training purposes.	Our use of your personal information is in our legitimate interest as a commercial organisation.
We may pass information to credit reference agencies and/or our insurers for general day to day business purposes.	Our use of your personal information is in our legitimate interest as a commercial organisation. In certain circumstances our use of your information in this way is necessary to comply with a relevant legal or regulatory obligation that we have.
Technical administration of the Websites, to enhance your experience of the Websites, research and development, customer service, marketing, and ad targeting.	In certain circumstances we will use your information in this way where you have provided your consent to us using the personal information. In other circumstances we may be required to use your information in this way in order to satisfy our legitimate interest as a commercial organisation. All of the above are subject to your stated preferences.
To operate CCTV systems on our sites and around the perimeter of the same.	We carry out these activities in order to protect our business and to ensure the physical security of our assets, sites and workforce. Our use of your personal information is in our legitimate interest as a commercial organisation.

SHARING PERSONAL INFORMATION WITHIN OAK TYRES, WITH OUR SERVICE PROVIDERS, OUR REGULATORS

In this section you can find out more about how we share personal information:

- within Oak Tyres UK;
- with third parties that help us provide our products and services; and
- with law enforcement and with regulatory bodies

We share your information in the manner and for the purposes described below:

- i. Your information may be shared with other companies in Oak Tyres group, where such disclosure is necessary to provide you with our services or to manage our business;
- ii. With third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. These include IT service providers who help manage our IT and back office systems;
- iii. With credit reference agencies and organisations working to prevent fraud;
- iv. With our regulators and law enforcement organisations, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.
- v. We may share in aggregate, statistical form, non-personal information regarding the visitors to our website, traffic patterns, and website usage with our partners, affiliates or advertisers.
- vi. If, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third party purchaser of our business or assets.

EXPLAINING MORE ABOUT DIRECT MARKETING

In this section you can find out more about

- how we use personal information to keep you up to date with our products and services.
- how you can manage your marketing preferences
- when and how we undertake profiling and analytics
- when and how we carry out automated decision making

How we use personal information to keep you up to date with our products and services

We may use personal information to let you know about our products and services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful. In all cases, we will respect your preferences for how you would like us to manage marketing activity with you.

How you can manage your marketing preferences

To protect privacy rights and to ensure you have control over how we manage marketing with you:

- we will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;
- you can ask us to stop direct marketing at any time - you can ask us to stop sending email marketing, by following the link to the preference centre which you will find on all the email marketing messages we send you. Alternatively you can send an email requesting that we stop our marketing activities to you, or contact us using the information at the end of this notice. Please specify whether you would like us to stop all forms of marketing or just a particular type (e.g. email); and
- you can change the way your browser manages cookies, which may be used to deliver online advertising, by following the settings on your browser as explained in our Cookie Policy.

We recommend you routinely review the privacy notices and preference settings that are available to you on any social media platforms as well as your preferences within your Oak Tyres account.

Our use of cookies

Our Websites use cookies. A cookie is a small file, typically of letters and numbers, downloaded onto your device when you access certain websites or services including www.oaktyres.co.uk. Cookies are then sent back to the originating website or service on each subsequent visit. Cookies do different jobs. For more detailed information about cookies and how they are used on our Websites see our Cookies Policy.

You can control the use of cookies. You may delete and block all cookies on our Websites but parts of the Websites will not work. For more information about controlling cookies please see our Cookies Policy.

TRANSFERRING PERSONAL INFORMATION GLOBALLY

In this section you can find out more about:

- how we operate as a global business and transfer data internationally.
- the arrangements we have in place to protect your personal information if we transfer it overseas.

Oak Tyres operates on a global basis. Accordingly, your personal information may be transferred and stored in countries outside the EU that are subject to different standards of data protection. We will take appropriate steps ensure that transfers of personal information are in accordance with applicable law and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangement are in place to protect your privacy rights. To this end:

- where we transfer your personal information outside Oak Tyres to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of personal information transferred from within the EU to the United States; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

You have a right to [contact us](#) for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

HOW WE PROTECT AND STORE YOUR INFORMATION

Security

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorised disclosure or access to such information appropriate to the nature of the information concerned. Measures we take include placing confidentiality requirements on our staff members and service providers; destroying or permanently anonymising personal information if it is no longer needed for the purposes for which it was collected. As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect sser IDs and passwords please take appropriate measures to protect this information.

Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting requirements.

In specific circumstances we may store your personal information 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 information or dealings.

LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. Click on the links below to learn more about each right you may have:

- To access personal information
- To rectify / erase personal information
- To restrict the processing of your personal information
- To transfer your personal information
- To object to the processing of personal information
- To object to how we use your personal information for direct marketing purposes
- To obtain a copy of personal information safeguards used for transfers outside your jurisdiction
- To lodge a complaint with your local supervisory authority

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by [contacting us](#). Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which we are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims;

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or

- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information. Details about how you can contact the Information Commissioner (the supervisory authority in the UK) are set out at the end of this Privacy Policy.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

CONTACT US

If you have any questions or comments about how we handle your personal information, or wish to exercise any of the rights described above, email us at gdpr@oaktyres.co.uk and gdpr@davanti-tyres.com (depending on which of our affiliates is responsible for the use of your information), telephone on 0844 493 8001 or write to us at Oak House, Woodlands Business Park, Ashton Road, Newton-Le-Willows, WA12 0HF.

We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

To contact your data protection supervisory authority

You have a right to lodge a complaint with your local data protection supervisory authority (i.e. your place of habitual residence, place of work or place of alleged infringement) at any time. The Information Commissioner is the UK's independent authority set up to uphold information rights and data privacy for individuals. The Information Commissioner's website can be found at www.ico.org.uk or you can call their helpline on 0303 123 1113.

We ask that you please attempt to resolve any issues with us before your local supervisory authority.