

Luxo Motors Ltd – Website & Business

Privacy Policy

Welcome to the Luxo Motors website and business privacy notice. Luxo Motors respects your privacy and is committed to protecting your personal data. This notice explains how we collect, use, store, and protect your personal data when you visit our website (regardless of where you visit it from), interact directly with our dealership, your privacy rights, and how the law protects you.

1. Important Information and Who We Are

Purpose of This Privacy Notice

This privacy notice aims to give you information on how Luxo Motors collects and processes your personal data through your use of this website and your direct interactions with our physical dealership, including any data you may provide when making an enquiry, subscribing to communications, applying for finance, or purchasing a vehicle or service.

Our services are intended for individuals aged 18 or over. We do not knowingly collect personal data from children.

It is important that you read this privacy notice together with any other privacy or fair processing notices we may provide on specific occasions so that you are fully aware of how and why we are using your data. This notice supplements the other notices and is not intended to override them.

Controller

Luxo Motors Ltd is the controller and responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this privacy notice). We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice.

If you have any questions, including requests to exercise your legal rights, please contact our Data Privacy Manager using the details below:

- **Full Name of Legal Entity:** Luxo Motors Ltd
- **Data Privacy Manager:** Mosharaf Saem Hussain
- **Email Address:** sales@luxomotors.co.uk
- **Telephone:** 01992 661880
- **Postal Address:** Jacks Hatch Garage, Epping Green Road, Epping, Essex, CM16 6QA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK's independent authority for data protection matters (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Keeping Your Data Up to Date

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The Data We Collect About You

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store, and transfer different kinds of personal data about you, grouped as follows:

- **Identity Data:** Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, and gender. It also includes copies of your driving licence when arranging vehicle test drives.
- **Contact Data:** Includes billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** Includes bank account, payment card details, and employment/income details required for finance broker submissions.
- **Transaction Data:** Includes details about payments to and from you and other details of products, services, or vehicles you have purchased from us.
- **Technical Data:** Includes 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 this website.
- **Profile Data:** Includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data:** Includes information about how you use our website, products, and services.

- **Visual Data:** Includes video and image footage captured by our Closed-Circuit Television (CCTV) system when you visit our physical showroom and forecourt premises.
- **Marketing and Communications Data:** Includes your preferences in receiving marketing communications from us and your communication preferences.

Aggregated Data

We also collect, use, and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can identify you, we treat the combined data as personal data used in accordance with this privacy notice.

Special Categories of Data

We do not intentionally collect **Special Categories of Personal Data** about you (information relating to race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, health, genetic, or biometric data), unless such information is necessary for a specific purpose or is voluntarily provided by you.

In limited circumstances, we or our partner brokers may process information relating to criminal convictions, offences, fraud prevention, or anti-money laundering requirements where required by law, or where necessary in connection with finance applications, insurance matters, regulatory obligations, or the protection of our legitimate business interests.

If You Fail to Provide Personal Data

Certain personal data is required for us to provide services, process vehicle transactions, comply with legal obligations, and assess finance applications via our brokers. Failure to provide such information may prevent us from providing the requested service or processing your vehicle transaction. In this case, we may have to cancel a service or transaction you have with us, but we will notify you immediately if this occurs.

3. How Is Your Personal Data Collected?

We use different methods to collect data from and about you, including through:

- **Direct Interactions:** You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or in person at our dealership. This includes personal data you provide when you:
 - Apply for our services or vehicle finance
 - Make an enquiry about a vehicle
 - Book a test drive and present your driving licence

- Create an account on our website
 - Request marketing to be sent to you
 - Enter a competition, promotion, or survey
 - Give us feedback or leave a review
- **Automated Technologies or Interactions:** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy for further details.
 - **On-Site Premises Security:** When you physically visit Jacks Hatch Garage, your image is automatically recorded by our on-site Closed-Circuit Television (CCTV) system.
 - **Third Parties or Publicly Available Sources:** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers, advertising networks, and search information providers.
 - Contact, Financial, and Transaction Data from finance brokers, vehicle history checking networks, and automotive marketing platforms (e.g., AutoTrader).
 - Identity and Contact Data from the DVLA (for title transfers) and other publicly available sources.

4. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we use it under the following legal bases:

- **Performance of a Contract:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate Interests:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- **Compliance with Legal Obligations:** Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, except where consent is required for certain direct marketing communications sent by email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for Which We Will Use Your Personal Data

Below is a breakdown of the ways we plan to use your personal data, the legal bases we rely on to do so, and our legitimate interests where appropriate. Note that we may process your data for more than one lawful ground depending on the specific purpose.

Purpose / Activity	Type of Data	Lawful Basis for Processing (Including Legitimate Interest)
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you

<p>To process and deliver your vehicle enquiry, request, or purchase, including:</p> <ul style="list-style-type: none"> • Managing payments, fees, and charges • Collecting and recovering money owed to us • Managing vehicle ownership records and checking vehicle history 	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing & Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us and verify valid asset titles)</p>
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<p>To manage our relationship with you, including:</p> <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey 	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing & Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)</p>
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To manage and facilitate physical on-site vehicle test drives	(a) Identity (Driving Licence) (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to ensure drivers hold valid driving entitlements and satisfy our commercial insurance criteria)
To maintain physical security and safety on our premises via CCTV	(a) Visual Data (CCTV footage)	Necessary for our legitimate interests (for running our business safely, protecting our premises and high-value vehicle stock, and for the prevention and detection of crime)

<p>To enable you to partake in a prize draw, competition, or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing & Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our services, to develop them, and grow our business)</p>
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<p>To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and during reorganisation)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p>	<p>Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business, and to inform our marketing strategy)</p>

	<p>(e) Marketing & Communications</p> <p>(f) Technical</p>	
<p>To use data analytics to improve our website, services, marketing, customer relationships, and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business, and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about vehicles or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>Necessary for our legitimate interests (to develop our services and grow our business)</p>

	(c) Technical	
	(d) Usage	
	(e) Profile	

Vehicle Finance Applications via Finance Brokers

Luxo Motors Ltd acts as a credit broker and not a lender. We do not maintain direct relationships or direct software links with retail finance lenders. Instead, where you request or apply for vehicle finance, we will submit your personal, financial, and employment information to our chosen third-party finance brokers.

These brokers act as independent data controllers and will pass your details to their own panel of lenders, credit reference agencies, and fraud prevention agencies to obtain finance quotations and assess your eligibility. These third-party entities may carry out creditworthiness, identity verification, and anti-money laundering checks which can leave a search record on your credit file. Because we work via brokers, the specific ultimate lender processing your data will depend entirely on which broker panel secures your approval. You can obtain full details on how these final lenders process your personal data by requesting their privacy notices directly from the finance broker processing your application. We may receive a commission or fee from the broker for introducing you.

Marketing & Promotional Offers

We provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage, and Profile Data to form a view on what we think you may want, need, or find interesting. Where permitted by applicable law, we may send you marketing communications relating to our vehicles and services. Where required, we will obtain your explicit consent before sending these communications.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message or by contacting us directly at any time. Opting out of marketing does not apply to personal data provided to us as a result of a vehicle purchase, service experience, or other transactional interactions.

Cookies

Our website uses cookies to distinguish you from other users, improve your browsing experience, and help us optimize our website. Where required by law, we will obtain your consent before placing non-essential cookies on your device. You can manage or withdraw your cookie preferences at any time through our website's cookie settings tool or via your browser configuration. Please note that disabling cookies may affect website functionality. For more information, please see our Cookie Policy.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis allowing us to do so.

5. Disclosures of Your Personal Data

We may share personal data with our partnered finance brokers, website hosting providers, analytics platforms, marketing service networks, professional advisers, regulators, public authorities (such as the DVLA and HMRC), and service providers where necessary for legal, regulatory, or operational purposes.

We may also share personal data with third parties in connection with a business sale, merger, acquisition, reorganisation, or transfer of assets. Any successor organisation will continue to use your personal data only as set out in this privacy notice.

We require all third parties to respect the security of your personal data and treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process it for specified purposes and in accordance with our strict instructions.

6. International Transfers

We do not routinely transfer your personal data outside the United Kingdom. However, some of our third-party digital service providers may process personal data outside the UK.

Where this occurs, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented in accordance with UK data protection laws:

- **Adequacy Regulations:** Transferring data to countries that have been deemed to provide an adequate level of protection for personal data.
- **Standard Contractual Clauses / Safeguards:** Utilizing the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or other legally recognised transfer mechanisms.

If you would like further information about international data transfers and the exact safeguards applied, please contact us.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a legitimate business need to know. They will only process your personal data on our instructions and are subject to a strict duty of confidentiality.

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

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including satisfying any legal, accounting, regulatory, or reporting requirements. Our general retention periods include:

- **Customer Records, Enquiries & Vehicle Transactions:** Retained for up to six years after the end of our relationship with you.
- **Accounting, Taxation & Financial Records:** Retained for up to six years, or longer where required by law.
- **Finance Application Records via Brokers:** Retained for periods required by applicable automotive retail regulations and credit broker financial compliance requirements.
- **CCTV Footage:** On-site visual security data is securely stored and automatically overwritten on a rolling 30-day cycle, unless flagged for an ongoing legal dispute or security investigation.
- **Marketing Records:** Retained until consent is withdrawn, you opt out, or we determine the information is no longer active.

- **Website Analytics Data:** Retained in accordance with our Cookie Policy and analytics platform settings.

In certain circumstances, we may retain personal data for longer where necessary to establish, exercise, or defend legal claims, comply with legal obligations, or resolve disputes.

Automated Decision-Making

We do not carry out automated decision-making or profiling that produces legal or similarly significant effects on individuals. Where you apply for finance through our credit brokers, the lenders they partner with may carry out automated decision-making as part of their credit underwriting process, details of which will be provided in their respective privacy notices.

9. Your Legal Rights

Under UK data protection laws, you have specific rights regarding your personal data:

- **Request Access:** (Commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and check that we are lawfully processing it.
- **Request Correction:** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide.
- **Request Erasure:** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete your data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully, or where we are legally required to erase it to comply with local law. Note, however, that we may not always be able to comply with your request for specific statutory legal reasons (such as financial audit trails or anti-money laundering requirements), which will be notified to you at the time of your request.
- **Object to Processing:** Where we are relying on a legitimate interest (or those of a third party) and something about your particular situation makes you want to object as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we process your data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your individual rights and freedoms.
- **Request Restriction of Processing:** This enables you to ask us to suspend processing your personal data if you want us to establish its accuracy, where our use is unlawful but you do not want it erased, where you need us to hold it for legal claims, or where you have objected but we need to verify overriding grounds.
- **Request Data Transfer:** We will provide your personal data to you or a chosen third party in a structured, commonly used, machine-readable format. (Applies only to automated information you initially consented to or where we used it to perform a contract) .

- **Withdraw Consent:** Where we rely on consent to process your data. Withdrawal will not affect the lawfulness of any processing carried out before you withdraw. If you withdraw consent, we may not be able to provide certain services, and we will advise you if this is the case.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to request further information in relation to your request specifically to speed up our response time.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests, in which case we will notify you and keep you updated.

Last updated: June 2026

Changes Made

1. **Dealership CCTV Framework Integration:** Incorporated visual tracking data terms across Sections 2, 3, and 4 to establish explicit UK GDPR compliance for Closed-Circuit Television (CCTV) security networks operating live on forecourts at Jacks Hatch Garage. Section 8 details a rolling 30-day overwriting safety cycle.
2. **Credit Brokerage Realignment:** Restructured Section 4's finance processing language to completely remove indirect "direct lender" wording. Clarified that Luxo Motors Ltd functions solely as a credit broker introducing data onwards to third-party independent broker panels rather than holding direct pipelines to capital lenders.
3. **Refined Statutory & Digital Service Disclosures:** Expanded Section 5 to itemize specialized backend infrastructure providers, notably: Website Hosting Providers, Analytics Providers, and Marketing Service Providers.
4. **Legal Rights Expansion:** Updated Section 9 to clearly spell out specific conditions surrounding right-to-erasure requests under UK data protection laws, while including parameters regarding the legal retention exceptions for "overriding compelling grounds" (such as vehicle anti-fraud measures). Added customer-facing phrasing concerning identity requests to accelerate company response times.