



**Redline Conversions Privacy
Policy (5th Edition)**

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Foreword

Redline Conversions Ltd operate from Daventry, Northamptonshire & Hitchin, Hertfordshire where we sell caravans, motorhomes (under the name Venture Caravan & Motorhomes) & camper vans (under the Redline Campers brand). All entities are controlled and owned by the same executive team who have led the company's growth, driven its values, ethics and culture. The executive team are also responsible for all legislative and regulatory demands within the company, including the safeguarding of our stakeholder's data, namely our customers, past, present and future. This duty falls to our 'Data Controller', Mr Dave Brown, Operations Director and is supported by the 'Data Privacy Team'.

We accept that when you transact with Venture to purchase Redline products and other goods and services, or to simply request further information from us, it's possible that you do so without having first read this Privacy Policy. Consequently, as a reputable company, we want to assure you that we are wholly committed to taking any appropriate steps to safeguard your personal data whilst maintaining the traditional values we hold for decency, fairness and transparency whilst your data remains in our care.

To uphold these standards, this Privacy Policy sets out our obligations and commitment to you and provides guidance on how you can request to see the data we hold on you, challenge its accuracy or revoking your permission by withdrawing consent at any time. Information on how to do this is contained in this document under, 'Subject Access Request'. Throughout your relationship with us, your personal data remains yours, we possess it solely to help us conduct a supportive and meaningful business relationship which we hope you will continue to value.

Introduction

As mentioned above, Redline Conversions and Venture Caravans operate three limited companies across two retail sites in Daventry & Hitchin.

Registered Address

VENTURE CARAVANS LIMITED
TOLL HOUSE
A5 WATLING STREET
WATFORD GAP
NORTHAMPTONSHIRE
NN6 7UJ
Company No. 07286914

Trading Address

VENTURE CARAVANS & MOTORHOMES
TOLL HOUSE
A5 WATLING STREET
WATFORD GAP
NORTHAMPTONSHIRE
NN6 7UJ

HITCHIN CARAVANS LTD
1110 ELLIOTT COURT COVENTRY
BUSINESS PARK
HERALD AVENUE
COVENTRY
WEST MIDLANDS
UNITED KINGDOM
CV5 6UB
Company No. 07862031

HITCHIN CARAVANS & MOTORHOMES
THE ROSE GARDENS
CAMBRIDGE ROAD
HITCHIN
HERTFORDSHIRE
SG4 0JX

When we refer in this document to, 'We, 'Us', 'Venture Caravans', 'Venture Caravans & Motorhomes', 'Venture' or Redline we are including both our company entities. When we refer to 'stakeholders', 'data subjects', 'consumers' or 'customers' we are speaking about members of the public or trade buyers who have a direct relationship with us and with our products and services and in so doing share their data as a result.

General Data Protection Regulation (GDPR)

On 25th May 2018 the Data Protection Bill frequently referred to as GDPR (General Data Protection Regulation) came into force. In doing so, it replaced the Data Protection Act (1998) and became the Data Protection Act (2018). This change was reflected by countries across all EU members states and in the UK simultaneously.

There are many similarities between the DPA and GDPR, however, there are some significant differences which bring positive changes to the way personal data is stored and processed. This applies to personal data which is held in both digital and printed forms wherever it's used.

Lawful Basis

The first of the changes under the new regulations, requires businesses to confirm on what basis they believe they should have access to your personal data. There are several types with the main ones being either 'Legitimate Interest' or full 'Consent'.

At Redline and Venture we believe that the most transparent and appropriate way for us to serve your needs is with your full 'Consent' which must be given freely and without coercion or restriction on our part.

Consequently, when you complete a sale, make an enquiry or arrive for a service you will be asked if you would like to provide us with your personal details for future warranty, service, repair or promotional marketing communications. Your instructions will be recorded in line with your consent. As we continue to serve you, we will record your details and may amalgamate these sources so that we know what you have entitled us to use your personal data for. You can unsubscribe from any email communication that you receive, and we will update our internal systems and our third-party communications channels accordingly.

As your consent is the entry basis we have always prescribed to, nothing has changed in that regard.

GDPR Data Inclusions - Personal Data

Under the new regulations the emphasis is that you, our customer and 'data subject' are in control of who you provide your personal data to, granting us permission to use it so that we may provide you with the services you choose in support of a commercial relationship with us. Put simply, you are in effect 'loaning' us the access rights to your personal data until you see fit to change this arrangement.

Personal data, often referred to as personal information, includes things like your name, address, email address, age, date of birth, telephone number(s), social media accounts, vehicle registration mark (VRM) or any other form of unique vehicle ID such as a Central Registration & Identification Scheme (CRIS) number. But it can also include things like your account number(s), or a unique IP address – anything in fact that can link to you as an individual. All of which falls under the protection of GDPR.

GDPR Data Exclusions – Transactional & Location Data

This is different to personal data and includes things related to your purchase history, namely the method(s), date and/or frequency of the method(s) used, vehicles purchased (apart from unique vehicle identifiers – see above), or part exchanges and the location where you made a purchase with us. As GDPR's focus is to protect your personal data, this information is generally not included under the regulations.

GDPR Data Exclusions - Financial Data

This is the third example of data that passes through our business and it includes credit and debit card information. However, the security of this is controlled and managed through other regulations namely the Payment Card Industry Data Security Standards (PCIDSS) which exists to further reduce your (and our) personal risk. This data bypasses Venture's systems and instead enters a payment gateway to be processed directly between your bank or charge card company, and our financial partner.

Profiling

Data profiling is a trusted technique that attributes other assumed or known factors to the personal data that you consent to provide us. The process will add things such as: the typical size of your family, the size and approximate value of your home, the range of occupations you might undertake, your age range, your propensity to read certain newspapers or to respond to marketing campaigns.

At Redline and Venture we don't use such methods to 'supplement' the data you provide us, but if at some stage we believe there is a value to you and us, we would seek your consent before introduction. Under GDPR you will always be able to see what data we hold on you by requesting a 'SAR' a Subject Access Request upon us (details on this follow below).

Processing Personal Data

Under the Data Protection Bill once your data is passed to us, by definition we become the 'Data Controller'. This definition is the highest definition placed upon us by the Information Commissioners Office (ICO) and means that we are charged with utmost level of care when it comes to safeguarding your privacy.

To preserve the relationship we have with you and not cause unnecessary frustration or anxiety to others, Venture will from time-to-time work to maintain the quality and relevancy of the data we hold, processing it against nationally verified suppression files such as change of address data, gone-away and bereavement registers. Whilst it's not a prerequisite to undertake such

tasks, we believe that in order to fulfil our obligations as 'Data Controller', amending and removing outdated information from our systems remains good business practice whilst also providing a duty of care to our customers and their families. This is a view which is wholly supported by the ICO.

Accessibility

Personal, transactional, locational and financial data is carried through our businesses systems and its movement and use is the responsibility of the company's Data Controller within Redline, Venture and Hitchin Caravans Ltd (as well as our Privacy Team). You can ask to see or amend what you believe are errors within your personal data or remove your permission for us to retain it, by following the steps that we describe next e.g. 'Subject Access Request' & 'Right to be Forgotten'.

Subject Access Request (SAR)

You can ask (by telephone/email or face-to-face) to receive a copy of your personal data whenever you choose under a process called a 'Subject Access Request'.

Under a 'SAR' we will provide you with a FREE copy of all the personal data we hold on you in a digital format (e.g. Microsoft Excel etc.) and this will be provided within 30 days from when we have been able to successfully validate who you say you are. This is particularly relevant in order to avoid any security breaches or false claims for access to your personal information.

If we believe your request is complex, we can extend the process for a further two months, but we will explain to you why this has been necessary within the initial 30 days of us validating who you are. If we deem your requests to be manifestly unfounded, excessive or particularly repetitive we are permitted to charge a reasonable administration fee to comply with requests for further copies of this information. Should these excessive requests continue we are legally entitled to refuse your request. However, if you disagree with our decision, you are within your rights to contact the Information Commissioner's Office and state the reason for your claim. All SAR requests are logged within our systems to manage and record the individual frequency of each and every request.

In addition to the personal data we retain, we may still show you examples of transactional, location or financial data that we hold (such as the sums you have paid, including deposits and outstanding payments) as we continue to further integrate our data sources, but this as an extension to our minimum legal obligations and our way of extending the level of trust and transparency in our ongoing relationship.

Right to be Forgotten (RTBF)

Should you ever decide to refuse us permission to use your personal data, you can invoke your 'Right to be Forgotten'. By activating this process, we will remove all your personal details from our systems. Once removed this information will not be available to you, or us again, and should you recommence your relationship with us at a future date and provide us with a fresh set of permissions, none of your previous personal data would be available for re-assignment at that stage.

You can invoke your Right to be Forgotten by telephone/email or face-to-face).

N.B. Please note that should you decide to invoke your RTBF, we are still required under other company law to store any transactional data that would have once been connected to you as an individual (for money-laundering/fraud/HMRC requirements).

CCTV

You will see located around our retail sites digital CCTV recording equipment. This equipment is there to safeguard you and our property whilst on our premises. It is not used to assign a personal identity to your photographic image and is therefore not governed by GDPR. This information may be legally used by the Police or other law enforcement agencies if called upon as part of any investigation.

Mailing & Telephone Preference Service (MPS & TPS)

Once you have given us your consent to communicate with you, any registration of your personal details on the Direct Marketing Association's – Mailing Preference Service (MPS) or Telephone Preference Service (TPS) cease to become valid, until you rescind your consent directly with us through any of the methods described above. Venture's policy of direct consent remains the only position we will use to communicate with customers. Any communications that we undertake with you via our e-marketing service will continue until you unsubscribe (as referenced earlier).

Privacy & Electronic Communications Regulations (2003)

The PECR is derived from European law (European Directive 2002/58/EC) and is also known as the 'E-Privacy Directive'. This regulation supplements the regulations under GDPR with its primary focus addressing personal privacy across passive or active forms of distributed electronic communication e.g. Email, SMS (Text Messaging), website tracking cookies, apps, digital telephony etc.

As this Regulation is amended and/or renamed the ePrivacy Regulation (ePR) and will be adopted by Venture Caravans within this Privacy Policy.

Online Activities

We accept that in this increasingly complex and joined up world consumers may not be au-fait with the methods we use to gather personal data. But as a Data Controller it is our role to make this as transparent as possible and provide you with a pathway to rescind your permission whenever you choose to do so.

Website Registrations

You will see displayed on our website a 'Contact form' for registering your details for periodic marketing communications. By completing this form, you agree to provide us with some of your personal details which will be included within our email subscription list and customer relationship software (CRM).

In the case of the former of these two systems your information is stored externally on our third-party UK web-based provider's server (Maxemail) but only we, as the Data Controller can use the information you provide. If you wish to see their Privacy Policy you can do so [here](#). With regard to our internal CRM system your personal information is also retained within this, so that we can action SAR and RTBF requests that you may choose to invoke.

Email Address Collection

In addition to the above you may be asked periodically by members of our sales and service staff, if you would like to sign-up for marketing emails. You are within your rights to refuse this and we will maintain a record of your current status in this regard. Declining does not affect the level of service and support we will provide you or infringe on your rights as a consumer.

Whereas we may be required to collect your email details to facilitate a sale, warranty, service booking or any other operational function that may include business closures. None of the data we gather for such purposes will be used for any marketing related emails.

The Use of Cookies

A cookie is a piece of computer code, a text file, that is made up of a series of letters and numbers and placed on your device each time you visit one of our websites. Although they may sound sinister to some, they're actually very useful as they allow us to greatly improve the experience we provide through our digital platforms.

The cookie itself does not contain or collect personally identifiable information (unless you've provided this through a web form) but instead will remember previous page visits, preferences and account details and will help us to recommend products that suit the users of your devices. These recommendations and preferences are all made automatically and are not associated with any personal information we have previously collected about you.

However, before this is done, you will have the option to accept it or decline them and you may also remove any cookies by adjusting the software settings of your browser to either delete the cookies which already exist and/or block new ones from being stored or accessed. All of the cookies we use are solely for the benefit of you, your device users and us. At no stage do we ever use third party cookies to gather usage information from our site.

What Cookies Can/Do We Use

We use three types of 'Cookie': Necessary, Functionality and Third-party cookies.

1. Necessary cookies (the page won't function without them)

These essential cookies do things like remember your progress through a form e.g. a request to download information. They always need to be on to fulfil any request you may have.

These cookies are:-

Cookie Name	Integration with	Expiration Time	Description
__zlcmid	Zendesk	1 year	Store visitor's machine-id for the Chat widget's authentication Chat Widget offers out-of-the-box cookie consent management. These Chat Cookies respect external cookie bot functionality as well.
__zlcprivacy	Zendesk	1 year	Store visitor's decision on Cookie Law
zte2095	Zendesk	Session	Used to identify the domain/subdomain that the Chat Widget is located on.
AWSALB	Amazon Web Services	Session	Used to ensure user session remains with the same AWS instance to improve performance and stability.
AWSALBCORS	Amazon Web Services	Session	Used to ensure user session remains with the same AWS instance to improve performance and stability.

2. Functionality Cookies (that remember your settings)

These cookies do things like remember your preferences and the choices you make, to personalise your experience of using the site. They are also used by the server to store information about on-page activities so users can easily pick up where they left off on the server's pages. Cookies can also store ordering information needed to make shopping carts function for both parties.

Woo Commerce Cookies are enabled on the online store and are active when a user interacts with one of the specific features whilst also allowing admin functions to be performed from within the store's dashboard. Details are provided in below, listing the various cookies that are set with Woo Commerce installed although no personal information is stored within them.

These cookies are:-

Cookie Name	Integration with	Expiration Time	Description
Woocommerce_cart_hash	Woo Commerce	Session	Helps Woo Commerce determine when cart contents/data changes.
Woocommerce_items_in_cart	Woo Commerce	Session	Helps Woo Commerce determine when cart contents/data changes
Wp_woocommerce_session	Woo Commerce	2 days	Contains a unique code for each customer so that it knows where to find the cart data in the database for each customer
Woocommerce_recently_viewed	Woo Commerce	Session	Powers the recent viewed products widget
Store_notice[notice id]	Woo Commerce	Session	Allows customers to dismiss the store notice

3. Third-Party Cookies (help with our digital marketing communications platforms)

These cookies may be set by third party websites to measure activity and performance, such as Google Analytics which allows us to measure how users interact with our website content. As a user navigates between web pages, Google Analytics provides us with JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page.

We may also record how you view YouTube videos that we may embed on our site or helping target advertisements to the right audiences. Some collect data to learn what websites visitors are checking online when they're not on our websites, but we don't use these.

These cookies are:-

Cookie Name	Integration with	Expiration Time	Description
gac<property-id>	Google	90 days	Contains campaign related information for the user.
_ga	Google	2 years	Used to distinguish users.
_gid	Google	24 hours	Used to distinguish users.
_gat	Google	1 minute	Used to throttle request rate.
AMP_TOKEN	Google	30 seconds to 1 year	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, in-flight request or an error retrieving a Client ID from AMP Client ID service.

Links to Other Websites

Our website may contain links to other websites outside of our control. Once you have used these links to leave our site, you should note that we can no longer take responsibility for your personal data privacy.

Social Media & Associated Competition Entries

We do not collect data from Facebook, Instagram or Twitter within any of our internal business information systems. These channels are currently used solely to engage and share information between us. As this data is not stored in our internal systems, you will not find this information listed as part of any Subject Access Request. However, if you choose to communicate with us through any of these public forums, we recommend that you don't post overly private or sensitive personal information which could be used by others to compromise you. Should you do so, anything you post will unfortunately be entirely at your own risk.

In the future we may choose to run competitions through these channels to supplement our existing methods for customer engagement. Should we do so, the content within this Privacy Policy will be updated and you will be duly notified, either through the portals or email if you have subscribed.

Should you enter, you consent to place your personal information in these public forums as part of any competition run by Venture, for example: your name, account name/social account ID, photographs and posts. Elements of this may be required to form the basis of the 'contract' between us, e.g. your willingness to enter the competition for fun and for the opportunity to win an associated prize; and for us to be able to make a random selection of the prize draw winner and to notify them of their success. Any personal data collected will be processed and used by us, only to the extent that is required to run the competition and to make an announcement to and about the successful entrant. Where the promotion is not operated by Venture Caravans, this may mean that in some cases we will be required to pass your details to the brand partner responsible for donating prizes, so that they can despatch your prize directly to you. Whenever that is the case, we will make it clear who the prize donor/promoter is by providing their company name and address on each promotion, so that you reliably informed whether to enter the competition or not.

In taking the decision to enter one of our online competitions you accept that in order to fulfil our legal obligations of announcing the winner, we will also publish some elements of your personal information online, either in the forum used for the competition, or on our website, but in so doing, we will not make all the information we have about you public.

Venture Caravans abides with the Gambling Act 2005 and follows the British Code of Advertising Practice (BCAP) guidelines on 'gaming and sales promotions' and competition transparency.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Our Responsibility Commitment

Venture's Data Controller will be responsible for the storing and processing of your data once you've given us your permission to use it and regardless of which of our data collection sources it comes to us from. At no stage will your personal data find its way into our systems unless you have willingly and freely provided it to us directly.

In possessing your personal data, we accept that this does not give us the right to abuse its use, and that consequently we will take due consideration of the balance between what we deem to be infringing your privacy and our ability to provide you with timely information, in effect creating a level of 'Privacy by Design'. Should you feel we've got this slightly wrong you can always remove specific permissions such as unsubscribing yourself from any future email activity using the unsubscribe link sent within every email campaign.

Our Data Controller commits to maintain your personal privacy throughout amendments to our system infrastructure and any of the commercial relationships we have with our third-party suppliers. These ongoing changes require that we review our Privacy Policy no less than once per annum and update the Policy edition, regardless of changes to the material content.

The only time we will share your data with anyone other than you, or members of our staff will be if we are required to do so as part of an investigation by law enforcement authorities.

Any changes we make to this Privacy Policy will be for the benefit of our customers and employees', but no changes will be made that breach our duty of care or any regulation. All changes will be notified in writing directly to you (as long as we have continued access to your personal data). They will also be made available on our website.

ICO - Declaration

Should you ever feel that we have not met the regulations, Venture Caravans Limited is registered with the Information Commissioner's Office under the following reference; -

- Venture Caravans (Daventry) - ICO Registration Number Z3240326
- Venture Caravans (Hitchin) - ICO Registration Number ZA038036

Contact

If you have any questions or concerns about how your personal data is handled and you would like to contact a member of our 'Data Privacy Team' responsible for your data's security, you can email them at, data@venture-caravans.com where a member of our team will be only too pleased to respond to your enquiry.