

## **PRIVACY POLICY**

BTC Solutions Limited is part of the Snap-on group of companies which process your data. BTC Solutions Limited operates under the trading name of autoVHC in Europe.

Should you have any questions or concerns regarding this policy, please contact:  
support@autovhc.com

We appreciate your interest in the services and your visit to this website. The protection of your privacy in the processing of your personal data is an important concern to which we pay special attention during our business processes.

This Privacy Policy answers frequently asked questions about the kinds of data we collect and how it is used. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### **1. What personal data do we gather?**

We collect and process a range of personal data including:

#### **Data you give to us:**

- **Your Data.** This is information about you that you give to us by filling in forms on the site or by corresponding with us by phone, e-mail, in person or at trade shows or events or otherwise. It is also data that you give to us that is collected via the autoVHC service. It includes information you provide when you register to use the site, subscribe to the service, search for a product and when you report a problem with the site. The information you give to us includes for example: name, title, address, business telephone number, purchase information, business email address, fax number, business-related information, dealer code, and the name of the company you work for.
- **Your Customer's Data.** This is information about your customers or clients that you give to us by using the autoVHC service, filling in forms on the site, or by corresponding with us by phone, e-mail, in person or at trade shows or events or otherwise. This primarily includes information you provide when you use the autoVHC service. The information you give to us about your customers or clients includes for example: name, address, telephone number, purchase information, email address, VIN number, make and model of car, and registration number.

#### **Data we collect about you:**

- With regard to each of your visits to the site we will automatically collect information about your visits through the use of various technologies, this will include information about your internet service provider, browser type, operating system, pages accessed on our sites and

online sources, and the date and time of access in order to optimise your user experience and enhance your time spent with us online. We also receive information telling us what site you came to this site from. This website, and associated online services use cookies to distinguish you from other users. This helps us to provide you with a good experience and also allows us to improve our site and services. For detailed information on the technologies we, see [“How we use cookies”](#).

#### **Data we collect from other sources:**

- We may also receive information about you from other websites we operate or the other services we provide. We may also receive information about you from an OEM you are doing business with. If we have collected information about you for another website or service, we will have informed you when we collected that data if we intend to share that data internally and/or combine it with data collected on this site. We will also have told you for what purpose we will share and combine your data. When an OEM provides us information about you, we ask the OEM to confirm that the information was legally acquired by them and that we have the right to obtain it from them and use it.
- We also work with third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, lead generators, data aggregators, social media platforms, and credit reference agencies.
- We also enable you to submit information about other people. For example, we may request that you provide us with information about your dealer or representative or, if you order a product for someone else online and want an order confirmation or report sent directly to that party, you might submit the recipient's name and address. The types of personal data that may be collected about other people include: dealer or representative's name and contact information, and the report recipient's name, address, e-mail address, and telephone number.

#### **2. How is that personal data used by us?**

We may use personal data held about you in the following ways:

- **Website Experience:** for the technical administration of the website; for internal operations; for customer administration; for product surveys; for troubleshooting; for data analysis, data analytics, testing, and research and development purposes; to ensure that content from our

site is presented in the most effective manner for you and for your computer; and as part of our efforts to keep our site safe and secure;

- **Business Uses:** to fulfil a transaction request or to carry out our obligations arising from any contracts you enter into with us or to send more information about products or services; to carry out a credit check; to send renewal notices; to establish and manage accounts; and to analyse and develop new products, services and website;
- **Providing Support:** to provide customer support, manage subscriptions, and respond to requests, questions, and comments; to notify you about changes to our service; and to measure how effectively we address your concerns and conduct surveys regarding our support;
- **Monitoring & Recording:** to handle any calls, chats or other interactions with us, including by the customer services team. Please be aware that it is our general practice to monitor and in some cases record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.
- **Protecting our Rights and Property:** to protect our rights or property or that of our business partners, franchisees, dealers, suppliers, customers or others when we have reasonable grounds to believe that such rights or property have been or could be affected; to recover debts; to prevent, detect, identify, investigate, respond, and protect against potential or actual claims, liabilities and prohibited behaviour or activities.
- **Information for our Business Partners:** to administer and develop our business relationship with you, the business partner, OEM you work with, including sharing information with our group and the OEM, to enter into or perform a transaction with you, to contact you as part of satisfaction surveys or for market research purposes;
- **Marketing:** to communicate about, and administer participation in, special events, programs, surveys, contests, sweepstakes, and other offers and promotions; to provide you with information about other goods and services we offer, or offered by others, that are similar to those that you have already purchased or enquired about and to send informational or promotional email messages to you, which you may opt out of receiving as described below; and
- **Surveys:** to request and receive from you information regarding your experience with our products and services. We may use the information to design offers customized to your interests.

### 3. On what legal basis do we gather and use my data?

We gather and use your personal data for either (i) the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and/or (ii) our legitimate interests and in compliance with your fundamental rights and freedoms. **Is my personal data transferred or provided to third parties?**

autoVHC is a global organization with affiliates, subsidiaries, business processes, management structures and technical systems that cross borders. As such, we will share the personal data we collect with Snap-on Incorporated, a Delaware, USA Corporation, and other companies within the Snap-on Incorporated group of companies and transfer it to countries in the world where we do business in connection with the uses identified above and in accordance with this Privacy Policy.

Subject to their compliance with applicable legislation and/or this Privacy Policy, we will also disclose your personal data to selected non-affiliated third parties, including those that perform transaction processing or servicing functions, and/or other companies that provide services on our behalf, professional service providers (including translators, legal advisers and accountants), adverse parties who have a legal right to receive such information and their counsel and experts, law enforcement authorities, and other government authorities.

We will disclose such data for the following purposes:

- to service the legal agreement between us and third parties, to enforce the terms of use, to meet our obligations to content and technology providers;
- to manage client, OEM, and customer accounts effectively, to service and process transactions, to market products and services offered by us and our affiliated companies, to manage our business;
- to improve and optimise our site and services;
- to enable them to offer products or services that may be of interest to you which you may opt out of receiving as described below; and
- as required by law in cases where we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or to protect our rights, property, or safety, as well as that of our customers, clients, dealers, franchisees or others or in response to a court order, subpoena or a law enforcement agency's request.

Circumstances may arise where, whether for strategic or other business reasons, we decide to sell, buy, merge or otherwise reorganise our business. Such a transaction may involve the disclosure of personal data to prospective or actual purchasers, or the receipt of such data from sellers. It is our practice to seek appropriate protection for data in these types of transactions.

We use non-identifying and aggregate information to better design and improve our web site and services and gather information for product management and development. For example, we may tell our sales and marketing staff that X number of individuals visited a certain area on our web site,

or that Y number of software licenses were ordered during a particular time period. This aggregate information may also be shared with our affiliates.

**4. How long will my personal data be kept for?**

We will endeavour not to keep your personal data in a form that allows you to be identified for any longer than is reasonably necessary for achieving the permitted purposes. This means that data will be destroyed or erased from our systems or anonymised when it has reached the applicable retention period. The applicable retention period for personal data is five (5) years from the date of collection. After this time, only statistical data is retained, which contains no personal identifiable information.

**5. Will my personal data be transferred to other countries?**

Personal data may be transferred outside of the European Economic Area (“EEA”) to members of our group and other third parties as set out above, provided that certain conditions as set out in the applicable legislation are complied with. Your personal data will also be processed by staff operating outside the EEA who work for us. This includes staff engaged in, among other things, the fulfilment of your order and the provision of support services.

We are party to a data transfer agreement with the members of our group and we will (i) keep that document up to date with current law, and (ii) only engage in personal data transfers from the EEA to outside the EEA in accordance with such an agreement or an alternative means of transfer in compliance with data protection legislation. For more information on the safeguards in place, please contact [support@autovhc.com](mailto:support@autovhc.com)

**6. What security measures are in place to protect my personal data?**

We endeavour to protect the security of your personal data. We will seek to maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we endeavour to protect your personal data, we cannot guarantee the security of your personal data transmitted to us or stored on our systems; any transmission is at your own risk. Once we have received your personal data, we will use procedures and security features to try to prevent unauthorised access. These procedures include physical, electronic, and managerial procedures.

**7. How do I update or access my personal data?**

We ask that you keep your data as up-to-date as possible so you may get the maximum benefit from us.

If you have an account with us then you can access and correct personal data that we keep in your online account by going to the Login page and entering your user id and password. For other questions related to updating or changing your account information or if any errors in your personal data cannot be corrected by accessing your information via the Login page, please contact [support@autovhc.com](mailto:support@autovhc.com)

**8. What rights do I have in relation to my personal data?**

If you are a citizen of the European Union or the European Economic Area, the General Data Protection Regulation (EU) 2016/679 may provide you with additional rights regarding our use of your personal data. Depending on the circumstances, you may have the right to:

- request access to any personal data we hold about you;
- object to the processing of your data for direct-marketing purposes;
- ask to have inaccurate data held about you amended or updated;
- ask to have your data erased or to restrict processing in certain limited situations;
- request the porting of your personal data to another organisation in control of your personal data; and/or
- object to any decision that significantly affects you being taken solely by a computer or other automated process.

If you wish to make a formal request for information we hold about you, you can initially contact us using the link on our website.

#### **9. How do I opt out of being contacted for promotional purposes?**

You have the right to ask us not to send you marketing communications. You can exercise the right to prevent such processing at any time by:

- Clicking the unsubscribe link in any informational or promotional email that we send you.
- Log in to your account, and go to the Profile area, where you can set your preferences for emails that are sent to you.

#### **10. How do we use cookies?**

We use cookies, tags, and other similar technologies to distinguish you from other users of our website, apps and online services. This helps us to provide you with a good experience when you browse our website, apps and online services and also allows us to improve our site and services.

Most browsers automatically accept cookies. By continuing to browse the site or use our services, you are agreeing to our use of cookies. However, you can prevent cookies from being stored on your computer or device by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your computer or device at any time. If you choose to set your browser settings so cookies are not accepted, then you can still visit our website, apps and online services, however doing so may affect your use of some

parts of our web services, apps and online services and reduce availability of the services provided by our website, apps and online services.

We use the following cookies:

- **Analytical/performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website, apps and online services when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Targeting cookies.** These cookies record your visit to our website, apps and online services, the pages you have visited and the links you have followed. We will use this information to make our website, apps and online services and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title	Cookie Type	Cookie Purpose	Retention Period
_ga	Statistical	Registers a unique ID that is used to generate statistical data on how visitors use the website	2 years
_gat	Statistical	Used by Google Analytics	1 day
_gid	Statistical	Registers a unique ID that is used to generate statistical data on how visitors use the website	1 day
NID	Marketing	Registers a unique ID that identifies user's device	6 months
r/collect	Marketing	Used by Google Analytics to track a user's device	Session
Vuid	Marketing	Collects data on users interactions with Vimeo content on the site	2 years

Except for essential cookies, all cookies will expire after 2 years.

## 11. What should I do if I think there has been a breach of the applicable data protection legislation or this Privacy Policy?

If you consider that the applicable data protection legislation or this policy has not been followed, then you should raise the matter with our Data Protection Manager at [DataProtectionManager@snapon.com](mailto:DataProtectionManager@snapon.com). Any breach will be taken seriously.

## **12. Modifications to this Privacy Statement**

We reserve the right to modify this Privacy Policy at any time and without prior notice. We will post any changes on our website so please check regularly for the most recent version of our Privacy Policy. This version was posted on 7<sup>th</sup> October 2019.

## **13. LINKS**

This site contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of those sites, and our Privacy Policy does not apply to information collected from you by those sites. We encourage you to read the privacy statements of each site that collects information from you. When you are leaving our site via a link to interact with a site that is not governed by our Privacy Policy, a new browser window will open. If your interaction with our site will require sending your information to a third-party site that is not governed by our privacy policy, we will clearly inform you before your information is sent.