

**HONDA MOTOR EUROPE LTD**  
**HONDA DEALERS PRIVACY NOTICE (UK)**

This Privacy Notice tells you how Honda Motor Europe Limited (“**Honda**”, “**we**” or “**us**”) process your personal data in the context of its relationship with Honda authorised Dealers (“**Honda Dealers**”) and their personnel (including employees, contractors, officers and representatives) (“**Dealer Personnel**”). It also describes your data protection rights, including a right to object to some of the processing that Honda carries out. More information about your rights, and how to exercise them, is set out in the “Your Choices and Rights” section.

**What Personal Data We Collect**

We process the following types of personal data from Dealer Personnel.

- **Contact information:** such as your name, position, phone, email, and other similar information.
- **Performance metrics:** such as information that allows us to assess the performance of the Honda Dealer, including Dealer Personnel.
- **Customer satisfaction reports** in which customers may share feedback about particular personnel.
- **Event Management** such as your name, phone, email, dietary information. Depending on the location of the event we may need your passport and driving license information, and where necessary we may need your next of kin. Where the event also invites partners, we may ask for similar information on your partner.

**Why We Collect, Use and Store this Personal Data**

We collect, use and store your personal data for the reasons set out below.

- **Where necessary for Honda's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights.**
  - Making Dealer Personnel contact details available to Honda personnel, Honda group companies, other Honda Dealers, third parties providing services to Honda Dealers and the Honda Dealer Network Council
  - Planning our business and operating the Honda Dealer network.
  - Protecting our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with compliance, regulatory, auditing, legal claims (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.
  - Considering the performance of Dealer Personnel, as required to evaluate the performance of the Honda Dealer, and also to run our awards program.
  - Maintaining the security of our equipment, facilities and electronic platforms.
- **Where necessary to comply with a legal obligation.**

- For compliance with anti-money laundering and other regulations that require the screening of members of the Honda Dealer network.

### **How We Share Your Personal Data**

#### (a) Transfers within the Honda Group of Companies

We share your personal data with **other members of the Honda group** to maintain a directory of Honda dealerships and to manage, support and coordinate dealership services.

For the purposes mentioned above, your personal data will be processed in, or accessed from, members of the Honda Group of Companies situated in jurisdictions outside the European Economic Area ("**EEA**") that do not have equivalent data protection laws to those in the EEA. When we transfer your data within the Honda Group of Companies, we make use of standard contractual data protection clauses, which have been approved by the European Commission.

#### (b) Transfers to companies providing services under contract

Your personal data will be shared with **companies providing services under contract** to the Honda Group of Companies, including the companies set out below (to the extent that you make use of the relevant service):

- IT help desk provider (current provider: ATOS IT Services UK Limited);
- IT hosting (current provider: IBM Belgium SPRL/BVBA);
- IT maintenance provider (current provider: IBM United Kingdom Limited);
- E-learning providers (current provider: Raytheon Professional Services GmbH);
- Training providers (various providers);
- Performance Metrics & Performance database support (current provider: River Limited, APD Limited);
- Mystery shops (current provider: various providers);
- Event planning providers (various);
- Dealer Marketing Centre (current provider: Karmarama);
- Dealer Asset Portal (current provider: Redwing Limited);
- The Hub email Marketing tool (current provider: Sign-up-to Limited);
- Point of Sale Materials (current provider: RRDonnelly Limited, Omni Limited, Impact Limited)
- Honda DNA (current provider: River Limited);
- Customer insurance providers (Aviva Limited)
- External legal advisors (current provider: Deloitte);

Further to the above purposes, we will transfer your personal data to organisations outside of the EEA. When doing so, we may use standard contractual data protection clauses, which have been approved by the European Commission. We may also transfer your data to organisations in the US who participate in the EU-US Privacy Shield or which have corporate rules in place to protect your data, which have been approved by EU data protection authorities. For further information, including to obtain a copy of the documents used to protect your information, please contact us as described in the Contact Us section below.

#### (c) Transfers to government authorities

Personal data will be shared with government authorities and/or law enforcement officials if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

### **Your Choices and Rights**

You have the right to **ask Honda for a copy** of your personal data; to **correct, delete** or **restrict** processing of your personal data; and to **obtain the personal data you provide in a structured, machine readable format**. In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement). Where we have asked for your consent, you may **withdraw consent** at any time. If you ask to withdraw your consent to Honda processing your data, this will not affect any processing which has already taken place at that time.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. If you have unresolved concerns, you have the **right to complain** to a data protection authority. Your relevant data protection authority could be in the place where you live, or where you work, or where a breach of data protection obligations has occurred.

### **Data Retention**

We will **retain** your personal data only for as long as we need it for Honda's legitimate interest in accordance with applicable law or to meet a legal requirement, after which we will take steps to delete your personal data or hold it in a form that no longer identifies you.

### **Contact Us**

The data controller for your personal data is Honda Motor Europe Limited, Cain Road, Bracknell, Berkshire, RG12 1HL.

If you have questions about this Privacy Notice or wish to contact us for any reason in relation to our personal data processing, please contact HME's Data Protection Officer ([DPO@honda-eu.com](mailto:DPO@honda-eu.com)).