

Privacy Policy

1. General

- 1.1. This privacy policy applies between you, the User of this Website, and ALFA Prestige LTD, the owner and provider of this Website. ALFA Prestige takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.
- 1.2. This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: <https://alfaprestige.co.uk/documents/TermsAndConditions.pdf>
- 1.3. Please read this privacy policy carefully.
- a. In this Privacy Policy, the following definitions are used unless the context requires a different interpretation:

Data	Collectively all information that you submit to ALFA Prestige via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
Cookies	A small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);
Data Protection Laws	Any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations, and secondary legislation;
GDPR	The UK General Data Protection Regulation;
ALFA Prestige LTD, ALFA Prestige, we or us	ALFA Prestige LTD;
UK and EU Cookie Law	The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018;
User or you	Any third party that accesses the Website and is not either (i) employed by ALFA Prestige and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to ALFA Prestige and accessing the Website in connection with the provision of such services;
Website	The website that you are currently using, alfaprestige.co.uk , and any sub-domains of this site unless expressly excluded by their terms and conditions.

- b. The singular includes the plural and vice versa;
- c. References to sub-clauses, clauses, schedules, or appendices are to sub-clauses, clauses, schedules, or appendices of this privacy policy;
- d. A reference to a person includes firms, companies, government entities, trusts, and partnerships;
- e. "Including" is understood to mean "including without limitation";
- f. Reference to any statutory provision includes any modification or amendment of it;

- g. The headings and sub-headings do not form part of this privacy policy

2. Scope of this Privacy Policy

- 2.1. This Privacy Policy applies only to the actions of ALFA Prestige and Users with respect to this Website. It does not extend to any third-party websites, platforms, or services that may be accessed from this Website, including but not limited to social media platforms, online booking services, or external payment providers linked through the Website;
- 2.2. For purposes of the applicable Data Protection Laws, ALFA Prestige is the "data controller". This means that ALFA Prestige determines the purposes for which and the manner in which your Data is processed;

3. Data collected

- 3.1. We may collect the following Data, which includes personal Data, from you:
- a. Full name;
 - b. Contact information, including your email address and telephone number;
 - c. Postcode, where you provide this as part of a Premium Sourcing enquiry;
 - d. Vehicle registration number(s) that you submit to us in connection with a vehicle sourcing or advisory enquiry, which we may use to obtain MOT history from the DVLA and vehicle data and finance-check information from UK Vehicle Data (see the section headed "Vehicle History and Finance Checks" below);
 - e. Free-text information that you provide to us, such as sourcing briefs, questionnaire answers, order details, follow-up messages, and reviews;
 - f. Your Stripe customer and payment identifiers (we do not receive or store your full card details — see the section headed "Stripe" below);
 - g. Your Auth0 user identifier, used to recognise your account when you sign in;
 - h. IP address, including the X-Forwarded-For header chain, and User-Agent (browser and device information) (automatically collected), including to keep a record that consent was given where this is required;
- 3.2. In each case, in accordance with this privacy policy.
- 3.3. Providing us with your contact details and, where relevant, a vehicle registration number is necessary for us to process your enquiry or provide our services to you; if you do not provide this information, we may be unable to assist you.

4. How We Collect Data

- 4.1. We collect Data in the following ways; data is given to us by you; and data is collected automatically.
- 4.2. ALFA Prestige will collect your Data in a number of ways, for example:
- a. When you contact us through the Website, by telephone, post, email, or through any other means;
 - b. When you complete surveys that we use for research purposes (although you are not obliged to respond to them);

- c. When you make payments to us, through this Website or otherwise;
 - d. When you elect to receive marketing communications from us;
 - e. When you use our services;
- 4.3. In each case, in accordance with this privacy policy.

5. Data that is collected automatically

- 5.1. To the extent that you access the Website, we may collect your Data automatically. For example:
- a. We automatically collect certain technical information about your visit to the Website. This information helps us improve Website performance, security, content, and navigation. It may include anonymised IP information, browser type, device information, the date and time of access, pages visited, and how you interact with the Website.
 - b. We use privacy-focused analytics tools, including Plausible Analytics, to help us understand overall Website usage and traffic trends in an aggregated manner.
 - c. The Website does not use advertising or tracking cookies. However, certain strictly necessary cookies or similar technologies may be used for essential Website functionality, security, and spam prevention services such as hCaptcha.
- 5.2. Plausible Analytics
- a. Plausible Analytics is used to measure overall Website traffic and usage trends in a privacy-friendly manner.
 - b. Plausible Analytics does not use cookies and is designed not to collect personally identifiable information or track individual users across websites.
 - c. Data collected through Plausible Analytics is aggregated and used solely for statistical purposes to help improve the Website and user experience.
 - d. To learn more about Plausible Analytics and its privacy practices, please refer to Plausible's Data Policy: <https://plausible.io/data-policy>

6. Our use of Data

- 6.1. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our website. Specifically, Data may be used by us for the following reasons:
- a. Providing our vehicle sourcing and advisory services to you, including processing your enquiries, questionnaires, orders, and your account within our customer portal (performance of a contract with you, or to take steps at your request before entering into one);
 - b. Verifying the MOT history and outstanding finance status of a vehicle you ask us to source or advise on, using the vehicle registration you provide (performance of a contract with you);
 - c. Internal record-keeping (our legitimate interest in maintaining accurate business records);
 - d. Improvement of our products/services (our legitimate interest in operating and improving a secure, effective service);
 - e. transmission by email of marketing materials that may be of interest to you (your consent, including soft opt-in consent where applicable — see below);

- f. contact for market research purposes, which may be done using email, telephone, fax, or mail (your consent, including soft opt-in consent where applicable — see below). Such information may be used to customise or update the Website;
- 6.2. In each case, in accordance with this privacy policy.
- 6.3. Where we rely on our legitimate interests as described above, you have the right to object in certain circumstances (see the section headed “Your rights” below).
- 6.4. For the delivery of direct marketing to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:
 - a. Soft opt-in consent is a specific type of consent that applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
- 6.5. For other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide.
- 6.6. If you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.
- 6.7. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

7. Automated Decision-Making

- 7.1. Our car match service uses automated processing to match you with vehicles based on the information you provide us, such as your sourcing brief and questionnaire answers. This automated matching does not involve any decision that produces legal effects concerning you or similarly significantly affects you — it generates suggestions for your own review, and you remain free to accept, reject, or ask us to change any match before proceeding. We do not otherwise carry out any solely automated decision-making, including profiling, that produces legal or similarly significant effects on you.

8. Who we share Data With

- 8.1. We may share your Data with the following groups of people for the following reasons:
 - a. Our employees, agents, and/or professional advisors;
 - b. Stripe, our third-party payment processor, who process payments made over the Website;
 - c. Auth0 (provided by Okta, Inc.), who provide identity verification and authentication services for our customer portal;
 - d. Seamless Cloud, who provide the hosting infrastructure for the Website and our customer portal;
 - e. hCaptcha (provided by Intuition Machines, Inc.), which is used via Seamless Cloud, our hosting provider, to protect our Website and online forms from spam, abuse, and automated submissions;
 - f. The DVLA, for MOT history checks on a vehicle you ask us to source or advise on;
 - g. UK Vehicle Data (ukvehicledata.co.uk), who provide vehicle data and finance-check information on a vehicle you ask us to source or advise on;

h. Relevant authorities;

8.2. In each case, in accordance with this privacy policy.

9. International Data Transfers

- 9.1. Some of the third parties we work with, including Stripe and hCaptcha (operated by Intuition Machines, Inc.), may store or process your Data outside the United Kingdom and European Economic Area (EEA), including in the United States.
- 9.2. Where your Data is transferred to the United States, we rely on applicable UK data protection transfer mechanisms. Where available, this may include the UK Extension to the EU-US Data Privacy Framework. Where a transfer is not covered by an applicable adequacy mechanism, we will use appropriate safeguards, such as the UK International Data Transfer Agreement (IDTA) or UK Addendum to the EU Standard Contractual Clauses, as applicable.
- 9.3. Auth0, our authentication provider, hosts and processes your Data within the United Kingdom, so no international transfer of Data occurs in respect of this processing.
- 9.4. UK Vehicle Data is a UK-based provider; to the extent it or the DVLA processes or stores Data outside the UK and EEA, we ensure the same safeguards described above apply.

10. Keeping Data Secure

- 10.1. We will use technical and organisational measures to safeguard your Data. For example:
 - a. Access to your account is controlled by a password and a user name that is unique to you.
 - b. We store your Data on secure servers.
 - c. Payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar, or both, in your browser when we use this technology).
 - d. Technical and organizational measures include measures to deal with any suspected data breach. If you suspect any misuse, loss, or unauthorized access to your Data, please let us know immediately by contacting us via this email address alfiehill@alfaprestige.co.uk.
 - e. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses, and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

11. Data retention

- 11.1. Unless a longer retention period is required or permitted by law, we retain different categories of Data for different periods, reflecting why we hold it:
 - a. Order, customer account, and payment records are retained for 6 years from the date of the relevant order, in line with standard UK tax and accounting record-keeping requirements, and so that we have a reliable record to rely on if the accuracy of a report or check we provided is later queried;
 - b. Where we generate a report for you directly, rather than performing a vehicle history, MOT, or finance-check lookup, that report remains accessible to you via your customer portal account for 90 days from the date of purchase. After this period, the report is no longer accessible to you via the portal, but the underlying data is retained internally for the remainder of the 6-year period described in paragraph (a) above;
 - c. Where we perform vehicle history, MOT, or finance-check lookups on your behalf, the results remain accessible to you via your customer portal account for the full 6-year period described in paragraph (a) above, so that this information continues to be available if its accuracy is later queried;

- d. Enquiries and questionnaire responses that do not result in an order are retained for 12 months from the date of submission, after which they are deleted;
 - e. Consent records (such as the IP address, User-Agent, and timestamp associated with a cookie consent choice) are retained for as long as the account or cookie to which they relate remains active, so that we can demonstrate that consent was given;
- 11.2. We will delete a customer portal account, including your login details, after 2 years of continuous inactivity. This does not affect our retention of order, payment, and report records for the periods described above, which we continue to hold even if the associated account has been deleted.
- 11.3. For any Data not covered above, we will only hold it for as long as is necessary to fulfil the purpose for which it was collected, or until you request that the Data be deleted.
- 11.4. Even if we delete your Data, it may persist on backup or archival media for a limited period for legal, tax, or regulatory purposes.

12. Your rights

- 12.1. You have the following rights in relation to your Data:
- a. Right to access - the right to request a copy of the personal data we hold about you. We may refuse your request if it's "manifestly unfounded or excessive."
 - b. Right to correct - the right to have your Data rectified if it is inaccurate or incomplete.
 - c. Right to erase - the right to request that we delete or remove your Data from our systems.
 - d. Right to restrict our use of your Data - the right to "block" us from using your Data or limit the way in which we can use it.
 - e. Right to data portability - the right to request that we move, copy, or transfer your Data.
 - f. Right to object - the right to object to our use of your Data, including where we use it for our legitimate interests.
- 12.2. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this email address: alfiehill@alfaprestige.co.uk.
- 12.3. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.
- 12.4. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

13. Links to other websites

- 13.1. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

14. Changes of business ownership and control

- 14.1. ALFA Prestige may, from time to time, expand or reduce our business, and this may involve the sale and/or the transfer of control of all or part of ALFA Prestige. Data provided by Users will be transferred along with that part and the new owner or controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
- 14.2. We may also disclose Data to a prospective purchaser of our business or any part of it.
- 14.3. In the above instances, we will take steps to ensure your privacy is protected.

15. Cookies

- 15.1. This Website may place and access certain Cookies on your computer. ALFA Prestige uses Cookies to improve your experience of using the Website and to improve our range of services. ALFA Prestige has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
- 15.2. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
- 15.3. Before the Website places non-essential Cookies on your computer or device, you will be presented with a message bar requesting your consent. Essential Cookies that are strictly necessary for the operation of the Website may be placed without your consent. By giving your consent to the placing of non-essential Cookies, you enable ALFA Prestige to provide a better experience and improved services. You may withdraw your consent at any time, although certain features of the Website may not function as intended.
- 15.4. This Website currently only uses strictly necessary cookies, which are always enabled and do not require your consent. We do not currently use analytical/performance, functionality, or targeting cookies; if this changes, we will update this privacy policy and our Cookie Policy, and request your consent where required.
- 15.5. You can find a list of Cookies that we use in the Cookies Policy, which can be found at:
<https://alfaprestige.co.uk/documents/CookiePolicy.pdf>
- 15.6. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, see the help menu in your internet browser. You can switch off Cookies at any time, but you may lose information that enables you to access the Website more quickly and efficiently.
- 15.7. You can choose to delete Cookies at any time, but you may lose information that enables you to access the Website more quickly and efficiently, including personalization settings.
- 15.8. It is recommended that you keep your internet browser up-to-date and consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
- 15.9. For more information generally on cookies, including how to disable them, please refer to <https://aboutcookies.org>. You will also find details on how to delete cookies from your computer.

15.10. hCaptcha

- a. We use hCaptcha, provided by Intuition Machines, Inc., via Seamless Cloud, our hosting provider, to protect our website and online forms from spam, abuse, and automated submissions.
- b. When you interact with a form protected by hCaptcha, hCaptcha may process information relating to your device and interaction with the website, including your IP address and other technical and interaction data. This information is used to determine whether the interaction is likely to have been made by a human.
- c. Intuition Machines, Inc. is based in the United States and states that it participates in the UK Extension to the EU-US Data Privacy Framework. hCaptcha may therefore process certain information in the United States in accordance with its applicable privacy and data protection arrangements.
- d. Further information is available in the hCaptcha Privacy Policy: <https://www.hcaptcha.com/privacy>.

15.11. Auth0

- a. We use Auth0, an identity and authentication service provided by Okta, Inc., to manage the secure sign-in process for our customer portal. When you sign in, you are redirected to Auth0's own hosted sign-in page; neither Auth0 nor our application sees or stores your password on our systems. Once sign-in is complete, our application sets the session cookies described in our Cookie Policy to keep you securely signed in. This processing is necessary for the performance of our contract with you under Art. 6(1)(b) of the GDPR, as you cannot access your account or use our services without it, and these cookies are therefore strictly necessary and do not require your consent under UK and EU cookie law. Auth0 hosts and processes your Data within the United Kingdom (see the section headed "International Data Transfers" above). For more information about Auth0's own privacy practices, please visit <https://auth0.com/privacy>.

15.12. Stripe

- a. We use Stripe, a third-party payment processor, to handle payments made through the Website. When you make a payment, you are directed to Stripe's own hosted checkout page; we do not receive or store your full card details on our systems. Because this is a full redirect, no cookies are set by Stripe on the Website itself — any cookies Stripe sets on its own checkout page to detect and prevent fraudulent use of the payment service are governed by Stripe's own cookie and privacy policies, not by this privacy policy or our Cookie Policy. This processing is necessary for the performance of our contract with you under Art. 6(1)(b) of the GDPR and for our legitimate interest in preventing fraud under Art. 6(1)(f) of the GDPR. Stripe may also act as an independent controller of your Data for its own regulatory and fraud-prevention purposes, and may process your Data outside the UK and EEA, including in the United States (see the section headed "International Data Transfers" above). Stripe, LLC states that it participates in the EU-U.S. Data Privacy Framework and the UK Extension to it, which we rely on as the transfer mechanism for this processing where applicable. For more information about Stripe's own privacy practices, please visit <https://stripe.com/gb/privacy>.

15.13. Seamless Cloud

- a. The Website and our customer portal are hosted on infrastructure provided by Seamless Cloud, running on Amazon Web Services (“AWS”) data centres located in the United Kingdom (London, eu-west-2 region). Seamless Cloud acts as our data processor for the purposes of storing and processing your Data on our behalf, and its personnel may, from time to time, access your Data for support and maintenance purposes, such as troubleshooting technical issues or carrying out essential system maintenance. This processing is necessary for our legitimate interest in operating a secure and reliable Website and customer portal under Art. 6(1)(f) of the GDPR, and for the performance of our contract with you under Art. 6(1)(b) of the GDPR. Because Seamless Cloud’s infrastructure for the Website is hosted within the United Kingdom, no international transfer of your Data takes place in connection with this hosting arrangement (see the section headed “International Data Transfers” above).

15.14. Vehicle History and Finance Checks

- a. When you ask us to source or advise on a specific vehicle, we submit the vehicle registration number to the DVLA’s MOT history service (a UK government service) to check its MOT status, and to UK Vehicle Data (ukvehicledata.co.uk), a third-party vehicle data provider, to check whether the vehicle has any outstanding finance and to obtain other vehicle data. We do not submit your name, contact details, or other personal Data to UK Vehicle Data as part of this check — only the vehicle registration number, which relates to a vehicle you are considering rather than one you currently own. This processing is necessary for the performance of our contract with you under Art. 6(1)(b) of the GDPR, as our advisory service depends on us being able to verify a vehicle’s history and finance status. UK Vehicle Data is a UK-based provider; see the section headed “International Data Transfers” above for how we handle any processing that takes place outside the UK.

16. Rights

- 16.1. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- 16.2. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal, or unenforceable, that provision or part-provision will be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 16.3. Unless otherwise agreed, no delay, act, or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 16.4. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

17. Changes to this privacy policy

- 17.1. ALFA Prestige reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website, and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.
- 17.2. You may contact ALFA Prestige by email at alfiehill@alfaprestige.co.uk or through our official social media channels and contact forms provided on this Website.

ALFA Prestige LTD is a company registered in England and Wales under company number 17470174, whose registered office is at 29 Ascough Wynd, Aiskew, Bedale, England, DL8 1AT.