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EDM Website Privacy Notice template
Ford.xx

Short Website Privacy Notice

This Short Website Privacy Notice summarizes the terms and conditions of processing personal data of users and visitors of www.Ford.xx ("the Website") in a short, concise and transparent way.

Data controller and its DPO	<please insert importer's full corporate name> ("we" or "us", address <please insert>, e-mail: <please insert>). You may contact our Data Protection Officer via e-mail at <please insert e-mail>
Purposes and legal basis	<p>We will use your data</p> <p>(i) to analyse the usability and quality of the Website and to ensure its secure operations, because we have a legitimate interest to improve the services on the Website and to protect it from misuse and system breaches;</p> <p>(ii) to manage and reply to your requests and inquiries, because we have a legitimate interest in meeting your needs and concerns as a user or customer.</p> <p>(iii) to take steps upon your request to fulfil your test drive request by sharing your details, test drive and purchase preferences with the dealer of your choice to enable them to fulfil your request and meeting your needs;</p> <p>(iv) to respond to legal requests from authorities, regulators, courts and third persons if necessary for the establishment, exercise or defence of legal claims or if it is a statutory legal obligation to provide the data</p> <p>(v) to perform our business operations, including general corporate operations, internal reporting, analysis, product and services development, based on our prevailing legitimate interests.</p>
Data recipients	We may disclose your data to dealers located in <please insert importer's country> upon your request or to our service providers that support us in providing our services, and we do so with appropriate guarantees and while preserving the security of your data.
Rights	You have the right to access, rectify or delete your data , as well as, on certain occasions, to object to the use of your data , in addition to other rights, as detailed in the additional information.
Additional information	For more information, please refer to our Full Privacy Notice .

FULL WEBSITE PRIVACY NOTICE www.Ford.xx

This Privacy Notice contains terms and conditions of processing personal data of customers, users and visitors of www.Ford.xx:

1. WHO IS THE DATA CONTROLLER?

The controller of your personal data is <please insert Ford importer full corporate name> (<please insert e-mail and address>) ("we" or "us"). You may contact our Data Protection Officer via e-mail at <please insert e-mail>

2. WHAT IS THE PURPOSE OF THE DATA PROCESSING?

We will process your data

- i. to analyse the usability and quality of the Website and to ensure its secure operations
- ii. to manage and reply to your requests, inquiries and complaints
- iii. to take steps upon your request to fulfil your test drive request by sharing your details, test drive and purchase preferences with the dealer of your choice to enable them to fulfil your request and meeting your needs;
- iv. to respond to legal requests from authorities, regulators, courts and third persons
- v. to perform our business operations, including general corporate operations, internal reporting, analysis, product and services development, based on our prevailing legitimate interest

3. WHAT PERSONAL DATA CATEGORIES DO WE PROCESS?

For the purposes indicated above we may process

- **Browsing and Website Usage Data**, including the type of the browser and the operating system you use, your IP address, the date and time of your connection to our Website, the number of sessions and your geographic location in relation with third party map services. The provision of this information is voluntary. If you do not provide the data, please do not use our Website.
- **Contact Information**, including your name and the email address, telephone number and the message you send to us. The provision of this information is voluntary. If you do not provide the information, we will not be able to identify you or to respond to your inquiry or request.
- **Test Drive Data**: in order to share your contact details as well as your test drive and purchase preferences with the preferred dealer of your choice to enable that dealer to contact you and fulfil your test drive request, we may process in addition to your contact details (address, e-mail address, telephone number), your geolocation data necessary to locate the closest dealer, your preferences regarding the test drive (timing, location, selected dealer, your special requests and the Ford model you selected to test drive) as well as any other information you voluntarily provide about your purchase preferences (when you're planning to purchase a vehicle). The provision of this information is voluntary. If you do not provide the data, we will not be able to provide you with a test drive opportunity or you must directly contact your dealer of your choice.
- **Vehicle and service information**: Ford car model, VIN number, license plate number, service information and the description of your complaint or request.

By providing your contact persons' personal data to us, you must warrant that (i) you have been authorized to provide that information; (ii) you have notified your contact person(s) about the contents of this notice and (iii) you will keep your contact person details up to date and accurate after you provided it to us.

4. WHAT IS THE LEGAL BASIS FOR DATA PROCESSING?

We may process your data for the legal bases of

- **Consent:** In certain cases we may ask for your consent to process your personal data, (pursuant to Article 6(1)(a) of the Regulation (EU) 2016/679 ("GDPR")). If we rely on consent, you may withdraw your consent at any time. The withdrawal of the consent does not have any effect on the data processing performed based on the consent before the consent was actually withdrawn.
- **Legitimate Interests:** data processing may also be based on our legitimate interest to handle your request or complaint or to respond to legal claims and requests (pursuant to Article 6(1)(f) of the GDPR).
- **Legal Obligation:** we may process your data on the basis of our legal obligations to respond to requests from authorities or courts (pursuant to Article 6(1)(c) and (e) of the GDPR).
- **Legal claims:** we may process your data for the establishment, exercise or defence of legal claims in response to third parties' requests (pursuant to Article 6(1)(f) and Article 9(2)(f) of the GDPR).

The processing purposes, processed data categories and applicable legal bases are set out in the table below:

Purposes of data processing	Processed Data Categories	Legal Bases
To analyse the usability and quality of the Website and to ensure its secure operations	Browsing and Website Usage Data	Legitimate interest
To manage and reply to your requests, inquiries and complaints.	Contact Information Vehicle and service information	Legitimate interest
To fulfil your test drive request and share your data with your chosen dealer;	Contact Information Test Drive Data	Consent
To respond to courts and authorities or third persons, if this is based on statutory law or for the establishment, exercise or defence of legal claims	Contact Information Browsing and Website Usage Data Vehicle and service information	Legal obligation Legitimate interest Legal claims
To perform our business operations, including general corporate operations, internal reporting, analysis, product and services development	Contact Information Browsing and Website Usage Data Vehicle and service information	Legitimate interest

5. OUR LEGITIMATE INTERESTS TO PROCESS YOUR DATA

We may process your personal data on the basis of our of a third persons' legitimate interests. We have conducted the balancing test to conclude our and third persons' prevailing legitimate interests regarding the processing of personal data. In this context, we have taken into account the extent to which your interests, rights and freedoms are impacted by our relevant data processing activities, our organizational structure and operations, and the guarantees provided to exercise your rights. We concluded that the data processing activities listed below do not disproportionately restrict your personal rights and freedoms and therefore we have a prevailing legitimate interest to process your data.

Processing activity	Legitimate interests
Analyse the usability and quality of the Website and to maintain its secure operations	We have a legitimate interest to conduct these data processing activities, because we need to monitor, detect and protect our IT systems, network, infrastructure, computers, information,

	intellectual property and other rights from unwanted security intrusion, unauthorised access, disclosure and acquisition of information, data and system breaches. We also process data to improve performance of our Website, troubleshoot bugs, and for internal product development needs. This will include monitoring of use and conduct analytics on our Website regarding its use, pages and links visited and patterns of navigation, time at a page, devices used and collecting information about where users are coming from.
Meeting the needs and concerns of users and customers and to handle complaints, including managing and replying to your requests	We have a legitimate interest in meeting the needs and concerns of our customers and their contact persons and to handle any complaints submitted to us. This may also include investigation of the relevant complaint and sharing your details with the dealer identified by you or if this is necessary for the resolution of your complaint. We may also share your Vehicle Information with Ford Central & Eastern European LLC (the manufacturer's representative) if this is necessary for the resolution of your complaint or handling of request relating to your vehicle or regarding legal claims.
Response to legal claims and requests	We have a legitimate interest to disclose unwanted security intrusion, unauthorised access, disclosure and acquisition of information, data and system breaches to authorities and courts and to respond to legal claims and requests from third persons.
Perform business operations, including internal reporting, analysis, product and services development	We will process customer personal data to operate the day-to-day running of our business and planning for strategic growth. This includes the management of customer relationships, sharing intelligence with internal stakeholders, implementing safety procedures, and planning and allocating resources and budget.

If you need more detailed information on our legitimate interests and the result of the balancing test, please contact us at [<please insert importer's dedicated e-mail address for privacy inquiries>](mailto: <please insert importer's dedicated e-mail address for privacy inquiries>).

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, whether we can achieve those purposes through other means and the applicable legal requirements. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We will retain Browsing and Website Usage Data for a maximum of 6 months counted from your last visit of our Website. We will retain Test Drive Data for a maximum of 30 days from the time we disclosed your personal data to the dealer you selected for conducting your test drive session. We will retain your Contact Information for two years counted from the last interaction with us, unless statutory law provides otherwise.

7. WHO MAY RECEIVE YOUR DATA?

We may share or disclose your personal data to:

(i) Our service providers: this Website is hosted by En-Co Software Kft. (Hungary, 6724 Szeged, Kossuth Lajos sugárút 72. B. ép.) on Azure servers provided by Microsoft Ireland Operations Limited (Attn: Data Protection Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. Telephone: (+353) 1 850 940 940) as a data processor. The e-mail servers are hosted by EZIT Kft (Budapest, Victor Hugo u. 22, 1132, Hungary).

(ii) Dealers you select for your test drive session or identified in your request or complaint in order to resolve that complaint or to comply with your request;

(iii) Ford Central & Eastern European LLC (1138 Budapest, Népfürdő utca 22., Hungary) if this is necessary for the resolution of your complaint or handling your request or regarding legal claims.

(iii) Professional advisors, such as lawyers and accountants located in **<please insert importer's country>**;

(iv) Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, the rights of any third party or individuals' personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues.

8. DO WE TRANSFER PERSONAL DATA OUTSIDE EUROPE?

To ensure that your personal data is secure, we will only transfer your information to countries outside of Europe where we do so in accordance with the GDPR. This requires that one of the following conditions applies:

- the European Commission has decided that the country provides an adequate level of protection for your personal data (in accordance with Article 45 of the GDPR);
- the transfer is subject to a legally binding and enforceable commitment on the recipient to protect the personal data (in accordance with Article 46 of the GDPR);
- the transfer is made subject to binding corporate rules (in accordance with Article 47 of the GDPR); or
- the transfer is based on a derogation from the GDPR restrictions on transferring personal data outside of the EU (in accordance with Article 49).

If you wish to obtain a copy of the relevant safeguards we apply, please contact us at **<please insert importer's dedicated e-mail for such inquiries>**.

9. YOUR RIGHTS

You are entitled to exercise your rights below:

- Right of access: You have a right to ask whether or not we have personal data about you and, if that is the case, request information on what personal data we have. We will also have to respond to questions about inter alia why we are using your personal data, details about what data we have and to whom we have provided access to the data. However, this is not an absolute right and the interests of other individuals may restrict your access rights.
- Right to rectification: We are required to rectify inaccurate personal data, or to complete personal data that is incomplete, on request.
- Right to erasure (right to be forgotten): We are in some circumstances required to erase personal data on request by the person concerned.
- Right to restriction of processing: We are in some circumstances required to restrict our use of personal data on request by the person concerned. In such cases, we may only use the data for certain limited purposes set out by the law.
- Right to data portability: Under certain circumstances, you may have the right to receive your personal data to which we have access, in a structured, commonly used and machine-readable format and such persons may then have a right to transmit those data to another entity without hindrance from us.
- Right to object:

You have the right to object to the processing of your personal data for any reason relating to your situation, and in this case, we may not be able to process your personal information. If you have the right to object and the exercise of this right is justified, your personal data in concern will not be further processed for the purposes of the objection. The exercise of this right does not entail any costs.

- Right to complaint: You also have the right to lodge a complaint with the competent supervisory authority in the particular Member State of your habitual residence for alleged infringement of the

GDPR. If you reside in <please insert importer's country>, that is the <please insert supervisory authority's name><supervisory authority's address>< supervisory authority's contact details>.

10. HOW TO CONTACT US?

We can provide further information or respond to requests to exercise the rights described above. You may contact us **or our Data Protection Officer** via e-mail at <please insert importer's dedicated e-mail for such inquiries> with such requests.