

APPLICATION SOLUTIONS (ELECTRONICS AND VISION) LIMITED PRIVACY NOTICE.

Introduction

Welcome to the privacy notice of Application Solutions (Electronics and Vision) Limited (“Continental” “we” “us” or “our”).

Continental respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Continental collects and processes your personal data, including but not limited to any data you may provide through this website or when you purchase or supply a product or service to or from us.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about

you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Application Solutions (Electronics and Vision) Limited. Continental Engineering Services. Unit 2, Victoria Industrial Estate, York Road, Burgess Hill, West Sussex, England, RH15 9TT (registered number 6437845) is the controller and responsible for your personal data.

We have appointed a data protection contact (DPC) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPC using the details set out below.

Contact details

Our contact details are set out below.

- Postal Address: Application Solutions (Electronics and Vision) Limited. Continental Engineering Services. Unit 2, Victoria Industrial Estate, York Road, Burgess Hill, West Sussex, England, RH15 9TT
- Email Address: AU_LX_SM_data_protection_ASL@continental.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or the Data Protection Commission (the Irish supervisory authority) (www.dataprotection.ie). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated in **October 2021** and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about individuals

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name and title (and if you are a delegate on one of our training courses, or attend a marketing event, may include a photograph or other image of your likeness), CCTV footage username or similar identifier and, in some cases (such as when we arrange hire cars for suppliers or journalists or you enter a competition) date of birth, gender and driving licence details or (such as when we help customer representatives with visa applications) passport, visa and other identification details.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account details (if, for example, you place orders with us in the capacity of a sole trader) and/or payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from or through us. In the case of warranty claims or complaints in relation to our products, this can also include information about your vehicle registration/mileage/tyres.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses
- **Technical Data** may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and/or WiFi.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or

are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - engage us to provide our products or services or we engage you to provide products or services to us (or your employer does and you provide us with this data in the course of your employment);
 - request marketing to be sent to you;
 - take part in a survey or competition;
 - make an enquiry through our website or by email or by telephone (including through our telephone contact centre – please note that we may record calls and keep records of website interactions, including for training and development purposes);
 - visit our premises (such as CCTV recordings and Contact and Identity details given via our visitor log system);
 - give us some feedback or contact us;
 - attend marketing events;
 - attend training courses; or
 - require assistance with a VISA application.
- **Automated technologies or interactions.** As you interact with our website or WiFi systems, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity Data, Contact Data, Financial Data, Transaction Data, Profile Data and Marketing and Communications Data from:
 - our locations in the UK to whom we supply parts, (in relation to returns or complaints)
 - third parties acting on our behalf (for example, in relation to promotions we participate in and which the end users of our products may sign up for)
 - Technical Data from analytics providers such as Google based inside or outside the EU.
 - Financial and Transaction Data from banks based inside or outside the UK and the EU.

- Identity and Contact Data from publicly available sources such as Companies House based inside and outside the UK and the EU and/or public websites which display information about you, such as LinkedIn.
- Identity and Contact Data from the providers of conferences which you and we may attend.
- Identity and Contact Data from your employer if they are engaged to provide products or services to us.
- Identity, Contact and Financial Data from credit reference agencies.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention Period
To register you as a new customer or supplier (or a representative of a customer of supplier).	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to provide our products and	6 years from last contact.

		services to our dealers and other customers) (where our contract is with your organisation)	
To deal directly with end-users of our products in relation to product returns, warranty claims or complaints or to respond to technical enquiries (including enquiries received through our website).	(a) Identity (b) Contact (c) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to process warranty claims and deal with technical enquiries about our products)	6 years from settlement or closure.
To process payments and deliver products and/or services to you or your organisation; or to receive products or services from you or your organisation, including: (a) Managing payments, fees and charges (b) Collecting and recover money owed to us (c) paying money that is owed to you or your organisation by us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (if our contract is with you) (b) Necessary for our legitimate interests (to recover debts due to us or deliver our products and services; or settle amounts we owe)	6 years from receipt of last payment.
To manage our relationship with you which may include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Replying to any correspondence you send to us	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (if our contract is with you) (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)	6 years from last contact.
To enable you to take part in prize draw, competition, promotion or complete a survey.	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study	2 years from completion of the competition or promotion, or if

	(d) Usage (e) Marketing and Communications	how customers use our products/services, to develop them and grow our business)	later, 2 years from last contact.
To run our external training courses.	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (provision of our training services and managing our relationship with relevant external trade or regulatory bodies)	6 years from the date of training carried out.
To manage visits individuals make to our premises (including the monitoring of CCTV) and events, including assisting with VISA applications.	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (managing our facilities and events) (c) Necessary to comply with a legal obligation	CCTV- 30 days for routine recordings. Visitor logs- 6 months from date of the visit. Visa applications – 6 months from the date of visit to the premises. Short term overseas business visitors 5 years (STBV Tax reporting requirements).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	Current year, plus 1 year.
To deliver relevant content and advertisements to you and measure or understand the	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services, to develop	2 years from last contact.

effectiveness of the advertising we serve to you.	(c) Profile (d) Usage (e) Marketing and Communications (f) Technical	them, to grow our business and to inform our marketing strategy)	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	2 years from last interaction with our website.
To make suggestions and recommendations to you about products, services, events and publications that may be of interest to you or your organisation.	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our products/services and grow our business)	2 years from last contact.
To give internal training and make internal developments to improve our website, products/services, marketing, customer relationships and experiences.	(a) Identity (b) Contact (c) Transaction (d) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to train and develop our staff, processes and systems)	2 years from last contact.
To follow up on enquiries, including those obtained at conferences.	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)	2 years from last contact.
To verify training your records either where you provide services to us or to verify training we provide to you to industry bodies and other relevant third parties.	(a) Identity	Necessary for our legitimate interests (to ensure you are appropriately qualified and to confirm you have undertaken training with us)	6 years from the date of training carried out.
For marketing purposes, including to promote our events or those arranged	(a) Identity	(a) Consent (b) Necessary for our legitimate interests (to	2 years from completion of the

by organisations with whom Continental partners or products/services and sending merchandise.		develop our products/services and grow our business)	event or promotion.
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think your organisation may want or need, or what may be of interest to your organisation. This is how we decide which products, services and offers may be relevant for your organisation (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details or when you took part in a survey or promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Continental or the Continental group of entities (as defined under Internal Third Parties) for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of websites may become inaccessible or not function properly. We currently do not use cookies on this site.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We share your personal data within the Continental worldwide group of companies (as defined under Internal Third Parties). This may involve transferring your data outside the UK and/or outside the European Economic Area (**EEA**).

Some of our External Third Parties are based outside the UK and the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the UK and the EEA.

Whenever we transfer your personal data out of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring **at least one** of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers in or otherwise transfer data to countries which do not have an adequate level of protection for personal data, we may use specific contracts approved for use in the UK and/or by the European Commission which give personal data the same protection it has in the UK or, as applicable, the EEA.
- For transfers of data to other members of the worldwide group of companies outside the UK, we will ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, please see *here*.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

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, accounting, or reporting 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 and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set out in the table *Purposes for which we will use your personal data* above.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#)

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other entities in the worldwide group of companies of which Application Solutions (Electronics and Vision) Limited forms a part, acting as joint controllers or processors, and who provide IT and system administration services and undertake leadership reporting. More information on the Continental worldwide group can be found *here*.

External Third Parties

- Service providers acting as processors inside and outside the UK and the EEA who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom and the EEA and worldwide who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, the Internal Revenue Service (USA), regulators and other authorities acting as processors or joint controllers based in the United Kingdom, the USA and the EEA and worldwide who require reporting of processing activities in certain circumstances.
- Continental's UK dealers, agents and customers inside and outside the United Kingdom and the EEA who engage us or refer business to us to supply products and services involving the processing of your personal data.
- Industry bodies, including those who engage us to provide training services to individuals.
- Organisations that Continental partners with for the purposes of a specific event, including where we arrange attendance for customers/suppliers and members of the general public (including competition winners), and with whom personal data may be shared for your entry into, or attendance at, these events.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.