

EFFECTIVE: 31st October 2025

1. Introduction

Welcome to The Classic Valuer Limited.

The Classic Valuer Limited (“us”, “we”, or “our”) operates <https://www.theclassicvaluer.com/> and the drive mobile application (hereinafter referred to as “Service”).

Our Privacy Policy governs your visit to <https://www.theclassicvaluer.com/> and the drive mobile application, and explains how we collect, safeguard and disclose information that results from your use of our Service.

We use your data to provide and improve Service. By using Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Our Terms and Conditions (“Terms”) govern all use of our Service and together with the Privacy Policy constitutes your agreement with us (“agreement”).

2. Definitions

- **SERVICE** means the <https://www.theclassicvaluer.com/> website and drive mobile application operated by The Classic Valuer Limited.
- **PERSONAL DATA** means data about a living individual who can be identified from that data (or from those and other information either in our possession or likely to come into our possession).
- **USAGE DATA** is data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).
- **COOKIES** are small files stored on your device (computer or mobile device).
- **DATA CONTROLLER** means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your data.
- **DATA PROCESSORS (OR SERVICE PROVIDERS)** means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.
- **USER** is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

3. Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Vehicle interests (such as cars you search for, save, or add to your dashboard)

Usage Data We may also collect information that your browser sends whenever you visit our Service or when you access Service by or through a mobile device ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Location Data We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customize our Service. You can enable or disable location services when you use our Service at any time by way of your device settings.

Tracking Cookies Data We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

4. Use of Data

The Classic Valuer Limited uses the collected data for various purposes:

- to provide and maintain our Service;
- to notify you about changes to our Service;
- to allow you to participate in interactive features of our Service when you choose to do so;
- to provide customer support;
- to gather analysis or valuable information so that we can improve our Service;
- to analyse your activity on our Service (such as vehicles viewed or saved) to create a profile of your interests. This may be used, with your consent, to send you or our partners' tailored marketing communications;
- to monitor the usage of our Service;
- to detect, prevent and address technical issues;
- to fulfill any other purpose for which you provide it;

- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about, unless you have opted not to receive such information;

For Commercial Purposes (With Your Explicit Consent)

- **NEW:** To share or sell your Personal Data (such as your name, email address, and vehicle interests) to our trusted third-party commercial partners, including but not limited to auction houses, car dealerships, insurers, or parts suppliers, for their own direct marketing, analysis, and commercial use. **We will only do this if you have given us your explicit, opt-in consent.**

Legal Basis for Processing Personal Data

We process Personal Data under the following legal bases:

- **Performance of a Contract:** To provide and maintain our core Service as described in our Terms.
- **Legitimate Interests:** For purposes like improving our Service, internal analytics, and security, which are not overridden by your data protection interests.
- **Consent:**
 - For sending you our own newsletters and marketing materials (from which you can opt-out).
 - **For sharing your Personal Data with our third-party commercial partners for their marketing purposes. This requires your specific, affirmative, "opt-in" consent, which you may withdraw at any time.**

5. Disclosure of Data

We may disclose personal information that we collect, or you provide:

- **Disclosure for Law Enforcement:** Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities.
- **Business Transaction:** If we or our subsidiaries are involved in a merger, acquisition or asset sale, your Personal Data may be transferred.
- **To Contractors and Service Providers:** We may disclose your information to contractors, service providers, and other third parties we use to support our business (e.g., payment processors, hosting providers). These parties are obligated not to disclose or use it for any other purpose than to perform these tasks on our behalf.
- **NEW: To Commercial Partners (With Your Explicit Consent):** If you have given us your explicit, opt-in consent, we may share or sell your Personal Data (including your name, email address, and vehicle interests) to our selected third-party commercial

partners. These partners may include auction houses, car insurers, dealers, or parts suppliers. They may use this data to contact you directly with their own marketing offers, products, or services.

- **Other Cases:**
 - To our subsidiaries and affiliates.
 - To fulfill the purpose for which you provide it.
 - With your consent in any other cases.

6. Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights, covered by GDPR.

- **The right to access, update or to delete** the information we have on you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where we rely on your consent to process your personal information.
 - **This includes the specific right to withdraw your consent for us to share your data with third-party commercial partners.**
 - You can withdraw your consent for third-party sharing at any time in your account settings or by emailing us at hello@theclassicvaluer.com.
 - To opt-out of our own marketing newsletters, please use the "unsubscribe" link in any marketing email.
 - Please note that withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of these rights, please email us at hello@theclassicvaluer.com. We may ask you to verify your identity before responding to such requests.

7. Other Sections (To be retained as-is from your original policy)

- **Retention of Data**
- **Transfer of Data**
- **Security of Data**
- **Your Data Protection Rights under the California Privacy Protection Act (CalOPPA)**
- **Service Providers** (including Analytics, Google Analytics, Payments)

- **Links to Other Sites**
- **Children's Privacy**

8. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

9. Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: hello@theclassicvaluer.com