

POLICY STATEMENT

DATA PROTECTION / DATA PRIVACY

What is Data Protection?

Data Protection laws govern how personal information, for example information that relates to individual employees and customers, is stored and used by organisations.



What is our policy on Data Protection?

Inchcape plc, and its subsidiary companies in each of its regions and markets, commit to keeping personal data secure, to processing it fairly and to complying with relevant data protection laws in each of the markets in which we operate. The aim of our policy is to ensure that everyone whose personal data we hold feels confident that Inchcape respects and safeguards their personal data and their right to privacy.

Why is it relevant to Inchcape?

Our world is increasingly an online world. As we spend more time online, we share more and more information about ourselves with different people and different organisations. That information

has significant value and as individuals we are becoming increasingly attuned to the need to protect our personal information.

Inchcape understands the value of personal data and has identified Digital, Data, Analytics & Cyber Security as one of the enablers of its Accelerate strategy. To succeed, we need to inspire confidence that we have the appetite and the capability to meet our policy goals.

For all of these reasons, we take the risks associated with data protection and data privacy seriously and maintain a programme to mitigate these risks. While we take a common approach to cyber security, our data management compliance programme is tailored to the specifics of each market in which we operate reflecting the nature of the local regulatory regime.

What is our Data Privacy Compliance Programme?

Top-level Commitment

Our Board sponsored Group Code of Conduct highlights the need for colleagues to comply with relevant local laws and regulations. Equally, this Data Protection / Data Privacy Policy Statement has also been approved by the Board. Our Audit Committee maintains oversight of our compliance programme.

Risk Assessment

Each region and market is required to specifically consider its data protection risks, how those risks may manifest in its market, and the measures that it takes to address proportionately those risks.

Proportionate procedures

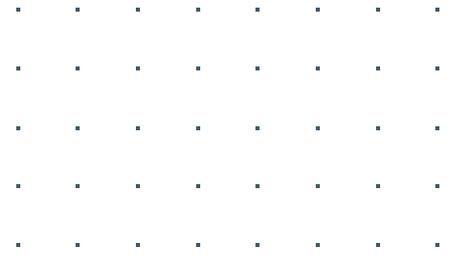
Each region and market is required to ensure that it has in place adequate

Bringing mobility to the world's communities; for today, for tomorrow and for the better

Our purpose drives us to make a positive contribution to the communities where we work. To achieve this requires Inchcape to do the right thing and to act responsibly towards our colleagues, our OEM partners, our suppliers and our customers. This is part of what it means to be a Responsible Business.

This policy statement sets out our approach to protecting the personal data that we hold and process as an organisation.

These are the standards we set for ourselves and expect our colleagues to uphold.



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procedures to proportionately address the risks that it has identified. These adequate procedures will vary from market to market based upon the local legal framework and the risks that are present in that market. The minimum requirement is that these adequate procedures represent compliance with the local legal framework, our Code of Conduct and this Policy Statement.

Communication (including training)

Where appropriate, colleagues who process personal data are required to undertake data protection training. In addition, all Group colleagues have received training on our Code of

Conduct which includes data protection requirements. It forms a part of our new starter induction programme. This Data Protection Law Policy Statement has been communicated to relevant teams in each of our regions and markets. Colleagues are informed of local policies and procedures via various means, including our local intranet sites.

Monitoring and review

We regularly conduct audits of our cyber security processes and our data privacy procedures in order to ensure that they meet the requirements of local law and adequately address the perceived risks.

Our Data Protection Programme is reviewed and updated on a regular basis to ensure appropriate policies, procedures and internal controls are in place to account for both changes in regulations and changes in our business and risk environment.

Duncan Tait

CEO of Inchcape plc

For and on behalf of Inchcape plc's Board of Directors