

## Doetrac Privacy Policy

### 1. Scope and purpose

This policy applies to the processing of customer personal data by Ernest Doe and Sons Limited (referred to as "Ernest Doe" or "we"). The purpose of this policy is to provide our customers with a general understanding of (a) the circumstances in which we collect and process your personal data; (b) the types of personal data we collect; (c) the reasons for collecting your personal data; and (d) how we handle your personal data.

### 2. Helpful definitions

The following terms, used throughout this policy, have the meanings set out in the Data Protection Act 1998:

**"Data controller"** a 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.

**"Personal data"** means data which relate to a living individual who can be identified (a) from those data, or (b) from those data and other information which is in the possession of, or is likely to come into the possession of the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

**"Processing"**, in relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data including (a) organisation, adaptation or alteration of the information or data, (b) retrieval, consultation or use of the information or data, (c) disclosure of the information or data by transmission, dissemination or otherwise making available, or (d) alignment, combination, blocking, erasure or destruction of the information or data.

### 3. Data Collection

You may provide us with information about you or a vehicle belonging to you when using Ernest Doe services. Such data may include:

- Your contact information (name, address, telephone number, email address, etc.);
- Demographic information (age, marital status, household composition, etc.); and
- Vehicle information (vehicle identification number (VIN), model, date of purchase, service history, etc.).

Your vehicle, when fitted with a DOETrac vehicle tracker, will also automatically collect data relating to the vehicle and its surroundings, primarily of a technical nature and not directly related to you as a person. Such data ("**Vehicle-recorded data**") is typically connected to the vehicle identification number (VIN) of the vehicle and may therefore be traceable to you. Vehicle-recorded data may include safety and servicing information, system functionality status, driving data and in particular location data.

We are particularly careful and apply additional measures if and when collecting and processing sensitive personal data, as required by applicable law. To the extent personal

identification numbers and credit card numbers are stored by Ernest Doe, such information is also considered sensitive.

#### **4. Notice**

Where reasonably practical or as required by applicable law, we will, in collecting or registering your personal data, provide you with (i) specific information as to the purposes of the processing of your personal data, (ii) the identity of the data controller, (iii) the identities of any third parties to whom the data may be disclosed and (iv) other information which may be necessary to ensure that you are able to safeguard your rights.

#### **5. Consent**

Where reasonably practical or as required by applicable law, we will obtain your consent prior to collecting or using your personal data. The request for your consent will be clear and provide you with a reasonable basis on which to make your decision. Your consent could always be revoked, for example by terminating a particular service or contacting Ernest Doe at [ ].

The collection and use of Vehicle-recorded data may be necessary in order for (i) diagnosis and rectification of faults during the service and maintenance of vehicles, (ii) managing warranty and servicing undertakings and (iii) fulfilment of legal requirements.

When collecting or using Vehicle-recorded data for these purposes, and for similar legitimate interests pursued by Ernest Doe, we will generally not seek your consent unless this is deemed necessary in the individual case or required by applicable law.

#### **6. Third party applications**

You may be able to access applications and other services connected to a vehicle but provided by a third party, which, for example, may require transfer of location data and other Vehicle-recorded data to the third party. Ernest Doe is not responsible for the collection or use of personal data in third party applications or services, and recommends that you carefully review the applicable terms and conditions of (and any privacy statement related to) such applications or services prior to use. If you have questions concerning a certain third party's use of your personal data, please contact the third party directly.

#### **7. Data Use**

The personal data which Ernest Doe collects about you and the vehicle will be used:

- To provide you with products and services, including to verify your eligibility for certain purchases and services as well as to offer you enhanced offers and experiences;
- To inform you of updates to, or changes in, our products and services, including but not limited to changes to our terms and conditions and policies;
- To inform you of new products, services and events;
- To provide vehicle support and services (warranty service, recall information, etc.);

- For product development purposes, for example to improve vehicle performance, quality and safety;
- To evaluate and improve our offering to and communication with customers; and
- To comply with legal requirements.

For most processing acts, you are able to opt out of our use of your personal data by updating your preferences, terminating a particular service, revoking your consent to the processing by contacting Ernest Doe at the address indicated in the "Information and Access" section below or as otherwise instructed by us. However, you may generally not opt out of the processing of your personal data which we perform in order to comply with our legal obligations.

## **8. Retention**

We will only retain your personal data for as long as it is necessary to fulfil the purposes outlined in this policy or the purposes of which you have otherwise been informed. This means that once you have consented to our processing of your personal data, we will retain your data in accordance with the consent given and/or until you revoke your consent. If you have revoked your consent, we may nevertheless retain certain personal data for the period required in order for us to meet our legal obligations and defend ourselves in legal disputes. If we have not obtained your consent to the processing, the data will only be retained for such a period of time as permitted by law.

## **9. Data quality**

Where we process your personal data, we strive to ensure that it is accurate and up-to-date. We will seek to erase or rectify personal data that is inaccurate or incomplete. For more information regarding your right to ensure the accuracy of your personal data held by us, please see the "Information and Access" section below.

## **10. Information and access**

As stated in the "Notice" section above, we may provide you with specific information concerning our processing of your personal data when collecting or registering such data.

Once per year you have the right to request and receive information on (i) what personal data relating to you we process, (ii) where the personal data is collected, (iii) the purpose of the processing, and (iv) with which recipients or categories of recipients the personal data is shared. Requests for such information must be made in writing and be personally signed by you, and include information on name, address and, preferably, your e-mail address. You also have the right to request that we correct, block or delete any incorrect data relating to you. Your requests will be dealt with in a prompt and proper manner. Requests to delete personal data will be subject to any applicable legal requirements. Where the applicable law provides a fee for complying with such a request, such a fee may be charged by Ernest Doe.

## **11. Security**

Ernest Doe strives to implement appropriate technical and organisational measures in order to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data.

## **12. Disclosures to third parties**

Ernest Doe, being the data controller of your personal data will, as a general rule, only disclose your personal data to a third party if it has received your consent to do so. However, we may share your personal data without your consent, unless we consider your consent necessary in the individual case or your consent is required by law, in the following situations:

- Vehicle-recorded data which is processed for other purposes than ensuring or developing our products and services or in order to manage our legal obligations;
- Situations in which disclosure is necessary for the purpose of a legitimate interest pursued by Ernest Doe (for example in order to protect our legal rights, as described above).

When disclosing your personal data to third parties, we will assess whether the disclosure requires additional protective measures.

## **13. Data processing on our behalf**

We restrict access to your personal data to Ernest Doe' employees and suppliers who need to use the information in order to process it on our behalf, and who are contractually required to keep your personal data secure and confidential. We aim to choose the option for data processing services that best safeguards the integrity of your personal data towards any third party.

## **14. Marketing**

We will not sell or trade your personal data with third parties unless we have your consent to do so.

We will not share your personal data with third parties for their marketing purposes, unless we have received your consent for such disclosures. If you have provided such consent, but wish to stop receiving marketing materials from a third party, please contact that third party directly.

We may provide you with information regarding new products, services, events or similar marketing activities. If you wish to unsubscribe to a particular e-mail newsletter or similar communication, please follow the instructions in the relevant communication.

## **15. Website and cookies**

In general, you can visit the Ernest Doe website without telling us who you are or revealing any information about yourself. In order to provide you with certain services or offers we, however, may need you to register certain personal data, such as your name and e-mail address. Even before such registration we may (through cookies) collect anonymous information about how you have used our websites. This information will be helpful to us in order to improve our websites or marketing.