

MCELMEEL MOBILITY SERVICES LTD PRIVACY POLICY

Summary

This privacy policy sets out how we gather, use, hold, share, disclose and protect (“process”) any personal information that you give to us when you use McElmeel Mobility Services Limited. By continuing to use mobility-services.com you are accepting this policy.

Useful contact details and a summary of the control you have over your personal data can be found at the end of this policy.

As part of your dealings with any member of McElmeel Mobility Services Limited, we will collect and otherwise process personal information about you to supply vehicles, goods and services to you and to administer our relationship with you. This may involve sharing your personal information with third parties. This Privacy Policy describes in detail how we will use your personal information and how you can exercise your rights with respect to your personal information.

If we decide to change this Privacy Policy, we will post the updated Privacy Policy on our websites so that you are always aware of what personal information we collect, how we use it and under what circumstances we disclose it. The updated Privacy Policy will take effect as soon as it is posted on our website.

Introduction

In this Privacy Policy, references to we, us or our (or words of similar import) means the McElmeel Mobility Services entity that processes your personal information (as defined below) and interacts with you (for example, the entity from whom you purchase a vehicle or other services).

The documents you receive from any McElmeel Mobility Services entity will identify the relevant entity that you are dealing with in any particular instance. These include:

- McElmeel Mobility Services Limited
- McElmeel Mobility Services Hire

In this Privacy Policy, references to you meaning the person whose personal information (as defined below) we collect, use and process. This includes anyone who visits our website, social media channels or contacts us in connection with the purchase of a vehicle and/or any goods or services we provide or otherwise interacts with us.

In this Privacy Policy, references to a website means any website owned and operated by or on behalf of any McElmeel Mobility Services Limited entity.

We are committed to protecting your privacy. We will use your personal information in accordance with the Data Protection Act 2018 and the EU General Data Protection Regulation 2016/679 thereafter (GDPR) both as amended from time to time (together the

Data Protection Legislation). and other applicable laws and regulations that relate to data protection and privacy.

What Information We Collect

We may collect and process information about you, including: your name, date of birth, address, contact details (including email address and mobile phone number), trade vehicle details, data collected as part of any finance application or payment (including previous addresses, employment details, payment and bill information, and bank account and credit or debit card details). We may also obtain copies of your driving licence and other identification, and your vehicle insurance details. This information is referred to in this Privacy Policy as personal information.

In particular, we may collect and process the following personal information about you:

- Information that you provide by filling in forms, including those on our websites and those on third-party websites that contain advertisements for our vehicles.
- A copy of your driving licence when you test drive a vehicle or data provided by an online checking service regarding your driving licence and any penalties.
- When you enquire about or purchase a vehicle or services, we collect personal information to respond to your enquiry and to process and complete your purchase.
- Details about the transactions you carry out with us including vehicle aftersales services and vehicle purchases and purchases of other goods (for example vehicle hire).
- Information contained in and records of communications between us, including emails, letters, and text messages.
- Details of your visits to our websites, including, but not limited to, traffic data, location data (including the country and telephone area code where your computer is located), IP address, browser and operating system information, and the resources that you access (including the pages of our website that you view and the website from which you access our website). For more details of how we collect data through the use of cookies, please see the separate cookies policy on our websites.
- Information concerning your marketing preferences where these rely on consent.
- Information relevant to the insurance products that we sell that are provided by third parties.
- Information from you to enable us to propose you for vehicle finance, as required by the relevant third-party finance company. This will include financial and employment information and verification documents.
- Details of diagnostic tests and work carried out on your vehicle including video footage and records of parts used.
- If you follow or comment on social media posts from or shared by McElmeel Mobility Services, we may collect details that are part of your public profile on social media sites.
- Details regarding your family members if they are provided to us as part of a vehicle purchase.

- We may be provided with personal information about you by competitors or finance companies if you have purchased a vehicle or enquired regarding a vehicle or work to be done.
- Details supplied by you as part of a competition or prize draw entry.

There may be circumstances when we collect special categories of personal data regarding your health, sexual orientation, or criminal convictions, if you provide this information to us as part of a discussion regarding your vehicle or vehicle enquiry.

If you provide us with personal information about another person, you must ensure that before you provide us with their personal information, you have their permission to do so and that they are aware of the ways in which we use personal information as set out in this Privacy Policy.

We may also collect non-identifying information about your preferences in connection with our websites, for the purposes of enhancing and personalising your experience on the Websites. We may provide our manufacturer partners and our advertisers with aggregate information about website users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

Storage

For the purposes of the Data Protection Legislation the relevant McElmeel Mobility Services entity is the data controller in respect of your personal information that we collect, and process as further described in this Privacy Policy. All information is stored on a database for each sector of the organisation to access.

We may share your personal information with other organisations that may receive and process your personal information as a data controller in their own right. Please see below for further information.

How We Use your Personal Information

We use your personal information in connection with our business activities. In particular, we may use your personal information in the following ways:

- Responding to queries from you regarding the possible purchase of goods or services, including looking at your searches and history on our website prior to an enquiry.
- Carrying out our obligations arising from any contracts entered into between you and us including purchase of vehicles and provision of services, and to respond to queries from you regarding those contracts.
- Management and administration of the relationships between you and us (or one or more of the members of McElmeel Mobility Services Limited).
- Notifying you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us.

- To provide you with information regarding other services and products that are available to you from us or third parties.
- To provide you with reminders regarding your vehicle including, for example, when your vehicle is due to have a service undertaken.
- Contacting you when you may be in a position to change your vehicle, including when your agreement is due for renewal.

If you enquire about a potential vehicle purchase, we will use your information to contact you for up to 3 months about that potential purchase. If you go ahead and purchase a vehicle from us, we will use your information in various other ways, details of which are provided to you at the time of your purchase. These include:

- Contacting you to obtain feedback on your purchase or other services provided.
- Contacting you in the future with service reminders.
- Contacting you in the future if you may be in a position to change your vehicle.

All of the above are examples of where we believe that we have a legitimate interest in doing so.

Protecting your Personal Information

Our security procedures mean that we may occasionally request proof of identity before we are able to disclose sensitive information to you. The transmission of information via the internet is not completely secure; this risk is not specific to our websites and is common across the internet. We cannot guarantee the security of your data (including your personal information) transmitted to our website; any transmission is at your own risk.

Marketing Preferences

If you think the personal information, we hold about you is inaccurate or incorrect, you can request that we correct this information (including your marketing preferences) by contacting us using the details below.

If you purchase a vehicle from us or have servicing or repair work carried out or purchased a service, McElmeel Mobility Services Limited will keep your information for 7 years from your last transaction with us. We may keep details of a vehicle for longer than that but without it being attached to your information. We will not retain information longer than we need to.

You can choose to stop receiving marketing emails or SMS messages from us by following the unsubscribe link and instructions on the respective marketing emails or SMS messages we send you.

You can also choose to change your marketing preferences by contacting us using the details below. This will not prevent all uses of your information (where we believe we have legitimate interests to use it) but if you are concerned about this you can ask us to stop all contact with you.

Access to Your Personal Information

The Data Protection Legislation gives you the right to access your personal information. To request access to your personal information, please contact us using the details below.

Request for Deletion of Information

You have the right to request that McElmeel Mobility Services Limited delete your personal data in certain circumstances if you would like more information about this please contact us using the details below. If you have purchased goods or services from us, we will retain details of your purchase for 7 years. If we are unable to delete your data as we believe that we are required to retain it, we will delete as much information as we are able to and will also stop sending you any further information.

Third Party Sites

Our websites contain links to other websites. This privacy policy applies only to our websites, so visitors should always be aware when they are moving to another site and read the privacy statement of any site which collects personal information. We cannot be responsible for the privacy policies and practices of other sites even if you access those using links from our websites.

We do not pass on any personal information about our visitors to any other site (unless we have obtained your consent to do so).

Cookies

Our websites use cookies. A cookie is a small file of letters and numbers this is placed on your device when you visit a website. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our website. Details of the cookies used and how we use the information we obtain are set out in our cookie policy at <https://www.mobility-services.com/cookie-policy/>

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Contact Details

Our contact email address is info@mobility-services.com. Our address for written correspondence is 15 Ballyscandal Road, Armagh, Northern Ireland, BT61 8BL. Our contact phone number is +44(0)2837525333.

Any Data Subject Access Request should be made to the following email address info@mobility-services.com.

You also 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.