

Privacy notice

PRIVACY POLICY

Dear visitors,

We are pleased to welcome you on our website or app.

This notice is designed to help you understand how [Amey Map Services Limited] uses your personal information. We encourage you to read the whole notice.

Who we are

This website and app is operated by [Amey Map Services Limited], registered in England and Wales under company number 10596171 with its registered address at 3rd Floor, 10 Furnival Street, London EC4A 1AB and which operates an electric vehicle charging network.

[Amey Map Services Limited] is part of a group of companies which provide public services, primarily in the UK but also in other countries (“**Amey Group Companies**”). When “we” or “us” is used in this Privacy Policy, it refers to [Amey Map Services Limited].

For the purposes of the data collected and processed in relation to this site or app and the services connected to the electric vehicle charging network, [Amey Map Services Limited] is the data controller.

The data relating to the services provided through this website and the electric vehicle charging network is processed by our subcontractor SWARCO UK Limited, registered in England and Wales with company number 02754698 with their registered address at 1 Maxted Corner, Maxted Road, Hemel Hempstead Industrial Estate, Hemel Hempstead, England, HP2 7RA (“**SWARCO UK**”). SWARCO UK is a subsidiary of SWARCO AG. SWARCO UK will only use your personal information as authorised by us.

What is personal information?

Personal information is information that relates to you or allows us to identify you. This includes obvious things like your name, address and telephone number but can also include less obvious things like analysis of your use of our websites, apps and charging network.

Our responsibility to you

We are responsible for ensuring that we comply with relevant data protection laws when processing your personal information (including any special category information or criminal records information).

Data governance manager

We have a data governance manager whose job is to oversee our data protection compliance. You can contact our data governance manager by sending an email to:

informationgovernance@amey.co.uk.

Scope

This Privacy Policy applies to all the personal information we collect about you as website or app visitor, customer, supplier, business partner or in general as an interested party to learn how we process your personal data.

[Amey Map Services Limited] is responsible for the operation of this website or app.

Customers of our electronic vehicle charging networks

What personal information do we collect?

We, or third parties on our behalf, may collect and use any of the following information about you:

- your name;
- your postal address;
- your email address;
- your telephone number;
- your car registration number;
- information provided when you correspond with us;
- any updates to information provided to us;
- your bank details to allow us to process payments for our services;
- information about the services we provide to you:
 - information needed to provide the services to you (including information on joining forms, order details, order history and payment details);
 - customer services information; and
 - customer relationship management and marketing information; and
 - usage information (including where, when and how often you use our service).
- information you provide to help us provide you with improved service, for example if we ask you to fill in a survey or questionnaire.

How do we use your personal information?

Purpose	Legal Basis
To provide you with EV charging services and process your payment details.	Our use of your personal information is necessary to perform our obligations under our contract with you (i.e. to fulfil a request from you for EV charging services and to comply with our terms and conditions).
To deal with any queries that you have about the EV charging services.	If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes.
To send you certain communications (including by email or post) about our products and services such as administrative messages (for example, setting out changes to our terms and conditions and keeping you informed about our fees and charges).	Our use of your personal information is necessary to perform our obligations under our contract with you (i.e. to fulfil a request from you for our products and services and comply with our terms and conditions).
To carry out statistical analysis and market research on people who may be interested in our products and services.	We may process your personal information for these purposes where it is in our legitimate interests for customer services purposes (including to understand the market for our products and services, and to make changes to them).

We need certain types of personal information so that we can provide services to you and perform contractual and other legal obligations that we have to you. If you do not provide us with such personal information, or if you ask us to delete it, you may no longer be able to access or use our EV Charging network.

Visitors to our website or app

What personal information do we collect?

We, or third parties on our behalf, may collect and use any of the following information about you:

- your name including your title;
- your postal address;
- your email address;
- your telephone number;
- information provided when you correspond with us;
- any updates to information provided to us;
- payment information (including bank or credit card details);

How do we use your personal information?

Purpose	Legal Basis
To allow you to access and use our website or app and create an account with us.	Our use of your personal information is necessary to perform our obligations under any contract with you (for example, to fulfil a request from you for our products or services, to comply with the terms of use of our website or app which you accept by accessing our website or app).
To receive enquiries from you through the website about our products and services.	Our use of your personal information is necessary to perform our obligations under any contract with you (for example, to fulfil a request from you for our products or services, to comply with the terms of use of our website or app which you accept by accessing our website or app).
For improvement and maintenance of our website or app and to provide technical support for our website or app.	Our use of your personal information for these purposes is necessary for our legitimate interests of: <ul style="list-style-type: none"> • running, growing and developing our business; • operating our website and our app efficiently and securely; • carrying out marketing, market research and business development;
To ensure the security of our website or app	
To recognise you when you return to our website or app, to store information about your preferences, and to allow us to customise the website or app according to your individual interests.	
To evaluate your visit to the website or app and prepare reports or compile statistics to understand the type of people who use our website or app, how they use our website or	

app and to make our website or app more intuitive. Such details will be anonymised as far as reasonably practicable and you will not be individually identifiable from the information collected.	
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Requests by e-mail/ contact form/ telephone/ post

What personal information do we collect?

We, or third parties on our behalf, may collect and use any of the following information about you:

- your name;
- your telephone number;
- your e-mail address;
- your location; and
- any other information that you submit to us

Data you submit via an order form or other form, which is necessary for the fulfilment or initiation of a contractual relationship will be marked as mandatory entry field (*). You may provide us with additional personal information but you are not required to do so.

Personal information that you provide to us by e-mail, telephone, post or via the contact form on our website or app will of course be treated as confidential.

How do we use your personal information?

Purpose	Legal basis
We will collect, use and store the personal information listed above to deal with any enquiries or issues you have about our products and services, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you.	<p>If we have a contract with you, then our use of your personal information is necessary for the performance of this contract.</p> <p>If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes and promoting customer satisfaction, to address each request, report or complaint in an appropriate manner and to inform you of the outcome. If you are a business contact then our legitimate interest arises from our need to conduct or initiate business relationships with customers, interested parties, suppliers and other business partners and to maintain personal contact with contact persons.</p>

Storage duration/ Criteria for defining the storage duration:

In principle, we store your personal data as long as it is necessary for the purpose for which it was collected. All personal data that you provide us through your requests will be deleted by us no later than 90 days after the final reply to you, or securely made anonymous. The 90-day

storage period is due to the fact that it may happen that you contact us again after an answer on the same matter and we can then refer to the previous correspondence. Experience has shown that after 90 days there are usually no more questions about our answers.

Data processing for marketing purposes

What personal information do we collect? [Amey Map Services Limited] or an Amey Group Company may use your name, address, email address, telephone number and personal preferences for marketing purposes, in particular for advertising by e-mail, telephone and post.

How do we use your personal information?

Purpose	Legal Basis
<p>We will collect, use and store the personal information listed above to undertake marketing to you. This marketing is to inform those concerned about products and services of [Amey Map Services Limited] or an Amey Group Company.</p>	<p>If you are an existing customer or a business contact then we will send you marketing about our own services if it is in our legitimate interests for business development and marketing purposes, to contact you (including by telephone or post) with information about our products and services or the products and services of our suppliers which either you request, or which we feel will be of interest to you.</p> <p>If you are a sole trader or a non-limited liability partnership or if you are not an existing customer then we will rely on your consent to contact you by email with information about our products and services or the products and services of our suppliers which either you request, or which we feel will be of interest to you .</p>

You can object from receiving marketing communications from us at any time with effect for the future by writing a message to support@be-ev.co.uk or accessing your account and updating your preferences.

Storage duration/ Criteria for defining the storage duration:

In principle, we store your personal data as long as it is necessary for the purpose for which it was collected. If you object from receiving marketing communications, we will stop processing your data in this way immediately but we may retain your data on our suppression list to ensure that we do not send you marketing communications in the future.

Research and business analytics

What personal information do we collect?

We may on occasion use personal data collected in order to inform our future network strategy, for example in deciding where to put future charging points to ensure we are providing customers with the best service possible. Any data will be anonymised before being used in this way.

How do we use your personal information?

Purpose	Legal basis
Research and business analytics allows us to enhance our local offering (e.g. we can determine that driver A who lives at location x charges 10 times a day on chargers 1 and 2, therefore we should enhance the local offering)	This use of personal data is necessary for our legitimate interests of providing our customers with the best possible services and locations of chargers.

Other purposes for the processing of personal data

Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

- to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we will process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We will process your personal information for these purposes where it is in our legitimate interests to do so;
- to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so;
- to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

Legitimate interests

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by contacting us at informationgovernance@amey.co.uk.

Consent We may process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below).

If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at informationgovernance@amey.co.uk and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide our marketing to you.

Recipients / categories of recipients

Disclosure of personal data within [Amey Map Services Limited] or an Amey Group Company: It may be necessary for us to transfer your requests sent to us by e-mail, contact form, telephone or post, including the personal data contained therein, to another Amey Group Company, if this is necessary for the purposes of processing your request. We may share your personal information with our group companies where it is in our legitimate interests to

do so for internal administrative purposes (for example, for corporate strategy, compliance, auditing and monitoring, research and development and quality assurance).

Disclosure of personal data to third parties:

The personal data collected is processed on our behalf by a third party processor called SWARCO UK. SWARCO UK have been carefully selected, audited by us and are contractually bound by a number of prescribed conditions (in particular on provision of suitable technical and organisational security measures).

We will share your personal information with the following third parties or categories of third parties:

- we may share anonymised and aggregated statistical information with our suppliers to demonstrate what interest there has been in any marketing campaigns we have assisted our suppliers in carrying out;
- our other service providers and sub-contractors, including payment processors, utility providers, suppliers of technical and support services, insurers, IT and cloud service providers;
- public agencies and the emergency services;
- companies that assist in our marketing, advertising and promotional activities, and
- analytics and search engine providers that assist us in the improvement and optimisation of our website or app.

Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

We will also disclose your personal information to third parties:

- where it is in our legitimate interests to do so to run, grow and develop our business:
 - if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
 - if substantially all of our or any of our affiliates' assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- in order to enforce or apply our terms of use, our terms and conditions for customers or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- to protect the rights, property, or safety of [Amey Map Services Limited], our staff, our customers or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or app or our goods and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be

personally identified. We do not sell or license your personal information to third parties for their own use without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

International data transfer:

In order to fulfil the purposes mentioned under this Privacy Policy, we or SWARCO UK may transfer your personal information to recipients outside the European Economic Area (EEA). In those countries there might not apply the same standard of data protection as in the UK.

Personal data will only be transferred to non-EEA countries under the following conditions:

- the transfer is made to a country where the European Commission considers that adequate protection of personal data is guaranteed, or
- appropriate measures have been taken to protect your data, in particular by contractual agreement on appropriate data protection measures or safeguards in accordance with the requirements of the European Commission or a data protection authority.

Usage data

When you visit our websites, so-called usage data is temporarily stored on our web server for statistical purposes as a protocol in order to improve the quality of our websites. This data set consists of

- the page from which the file was requested,
- the name of the file,
- the date and time of the query,
- the amount of data transferred,
- the access status (file transferred, file not found),
- the description of the type of web browser used,
- the IP address of the requesting computer.

We use this information to enable access to our website, to control and administer our systems and to improve the design of our websites. These data are stored anonymously. The creation of personal user profiles is thus excluded. Data about individuals or their individual behaviour is not collected.

Cookies

Cookies are small files that are stored on a visitor's computer or other device. They allow information to be stored for a certain period of time and to identify the visitor's computer or other device. You can set your browser or operating system controls so that it informs you about the placement of cookies. This makes the use of cookies transparent for you. For further details on how we use cookies, please see our [cookies policy](#).

Encryption

To protect your data from unwanted access, we use an encryption method on most pages. Your details are then transmitted from your computer to our server and vice versa via the Internet using SHA2 265-bit SSL encryption (Secure Socket Layer) with RSA. You can recognize this by the fact that the lock symbol on the status bar of your browser is closed and the address line starts with https://.

No obligation to provide personal information

Unless otherwise stated above, the provision of personal data is neither required by law or contract nor necessary for conclusion of a contract and you are hence not obliged to provide

such data. If you choose not to provide us with your personal information, we might not be able to respond to your request or provide you with the requested service and participating in an application procedure or in a particular event or protection might not be possible.

Your rights

Right of access:

You have the right to request confirmation as to whether personal data relating to you are processed and, if this is the case, to receive information about the personal data we hold about you.

Right to rectification and erasure:

You have the right to have modify, correct or in general amend your personal information. Furthermore, you have the right to request the deletion of personal data concerning you if certain conditions are met (e.g. if the data is no longer required for the purposes pursued).

Right to restriction of processing:

You have the right to request the restriction of the processing of your personal data if one of a number of conditions are met e.g. if you have objected to the processing, for the duration of any examination of our right to data processing or in the event that personal data are no longer required for processing purposes but must continue to be reserved for the assertion, exercise or defence of legal claims.

A restriction on the processing means that the data in question may only be processed - apart from being stored - with your consent or in order to assert, exercise or defend legal claims, to protect the rights of another person or for reasons of an important public interest of the European Union or a Member State.

Right to data portability:

If automated data processing is based on your consent or processing is necessary for the fulfilment of a contract with you or for the implementation of pre-contractual measures that take place at your request, you have the right to receive the personal data you have provided and which concerns you in a structured, current and machine-readable format and to transmit this data to another controller without hindrance from the controller to which the personal data have been provided. You also have the right to request the direct transmission of this data by us to a third party if this is technically feasible.

Right of objection:

If we process personal data for the protection of legitimate interests (as stated above), you have the right to object to the processing at any time for reasons arising from your particular situation. We will then no longer process the personal data unless there are demonstrably compelling reasons worthy of protection for further processing which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Right of withdrawal:

If the data processing is based on a consent provided, you can withdraw your consent at any time with effect for the future. However, such withdrawal shall not affect the lawfulness of data processing based on consent before its withdrawal.

To exercise the rights outlined above or in the event of open questions, please send your request to informationgovernance@amey.co.uk. We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period under applicable law). Please note, however, that certain personal information may be exempt from such requests in

certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

Right to lodge a complaint with a supervisory authority:

In addition, you have the right to lodge a formal complaint with the respective data protection authority in your jurisdiction, if you believe that the processing of personal data concerning you violates applicable data protection regulations. In particular, the complaint may be lodged with a supervisory authority in the EU Member State of your place of residence, place of work or the place of alleged violation.

Changes to this Privacy Policy

We may change this privacy policy in order to comply with applicable legal requirement. The current privacy policy can be found on our website or app and we therefore encourage you to regularly check it for any changes. Where reasonably practicable to do so, any material changes to our policy will be notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy. This version is dated 12th June 2020