

Plug-N-Go Group Customer Privacy Notice

Who does this privacy policy apply to ?

This privacy notice details how Plug-N-Go EV Limited and its subsidiaries (PNG) process your personal data. This privacy policy applies when you use PNG's products and services or otherwise interact with PNG.

What personal data do you collect ?

By using this website, mobile app and/or your purchase of PNG products and services, we may collect, store and process some or all of the following data about you :

- Your identity and contact information, such as your title, name and address, telephone number, e-mail address and any other information which you provide to us.
- For business users, location and details of your property, availability of off-street parking, details of your electricity supply and supplier, details of charge points installed
- Vehicle information : details of your vehicle, the make, model, registration number and ownership information, battery capacity and charging speed.
- Details of products and services you have bought from us, including your usage of PNG operated charge points, any faults you have reported or other issues with PNG's charging network and your feedback.
- Your payment details, such as debit or credit card number, cardholder name, expiry date, CVC number, and details of payments from and to you.
- Your marketing preferences, including your consent to PNG sending you marketing information.
- Details of your use and interaction with the PNG website and app.
- Any other information you give us when dealing with us by e-mail or telephone or interacting with the PNG website or app.,

Why do we collect your personal data ?

PNG needs the information you give us, legitimately, to deal with your enquiries efficiently and , in the case of payment details to be able to enable charging from our network of charge points.

If your enquiry relates to the purchase of products or services from us, we may need additional information, including property information and vehicle information, in order to advise you on which product / service is most suitable.

If you purchase or use an "intelligent" charge point, through our cloud based, back office solution, we will collect charging information in order to reconcile the charging revenue we receive and, where applicable, provide you with this information.

If you wish to open an account with PNG, in order to charge your vehicle at any one of PNG's or our alliance partners' charge points and to order a "fob" to facilitate future charging, we require your payment card details and the address to which the fob should be delivered.

If you contact us to alert us to any fault, with the PNG charging network or your charging point, we will record this information against your account, in order to track the fault and ensure it is remedied effectively and efficiently, in order to fulfil our contract with you and meet our service levels.

We may aggregate your personal information with other customers' in order to undertake market research and to improve our internal systems and processes. We may also contact you to ask whether you would be prepared in surveys.

If you do consent to our sending you marketing information, we will keep this data and use it to send you information about PNG products and services we believe may be of interest to you. You can opt out at any stage, by activating the "opt out" key at the end of the marketing information.

On your first visit to the PNG website, we will alert you to the use of cookies, which manage your interaction with the site. You can either accept all cookies or choose which category of cookies you will accept. Please note that there are certain basic cookies that we are legally entitled to use, being strictly necessary for the operation of the PNG website. Acceptance of cookies (other than those strictly necessary) is totally voluntary.

Where we are processing your data, based on your consent, you can withdraw your consent at any time. There are standard ways to do this, such as in the cookie consent request or the unsubscribe option on marketing messages. You can ask for any other data to be removed from our databases at any time by contacting the queries handler, referred to below. However, this may result in a reduction in our service levels to you.

What purposes can my data be put to ?

PNG will only use your personal data for the purpose for which we collected it, as set out above, unless we reasonably consider we may need to use it for another reason, which is compatible with the original purpose.

If we need to use your data for an unrelated purpose, we will notify you and explain the legal basis, which allows us to do so.

How long do you keep my personal data ?

We only keep your personal data for as long as is necessary for the purpose for which such information is collected, after which we anonymise it or delete it.

The length of time your data is retained will depend on the purpose for which it is collected. For example, in the case of your not using any of our charge points for a period of twelve

months, we will delete your personal data. For online purchases (other than charging), we will not retain your payment card details, once the payment transaction has been completed.

Who do you share my personal data with ?

PNG uses third party service providers to provide cloud based, back office and payment solutions for our charge points. The charge points are linked to the service provider using a SIM and the 3,4 or 5 G telephone network. It will be necessary to share your personal data with these providers.

Any third party provider, who we use, must agree to use your data only for the specified purpose set out in our written contract with them and ensure it is secure. All service providers within the EU must comply with GDPR legislation. If we transfer your personal data outside the European Economic Area, we will require safeguards to ensure your personal data is adequately protected.

For sales of services and products, including charging fees, through our app or website, we share your payment card details with our card payment processors and other third parties which may be involved in the provision of the service.

PNG will not share your personal data with any third parties for marketing purposes, unless we have your express consent to do so.

We may disclose your personal data to any other PNG Group subsidiary, on a “need to know” basis. All PNG subsidiaries are bound by this privacy policy.

In the case of a purchase by you of a PNG charger, we may provide certain of your personal data to the local distribution network operator and the installer, on a “need to know” basis to ensure that adequate capacity is available.

We will disclose your personal data in order to comply with any legal obligation or order to do so or co-operate with law enforcement.

If PNG is installing a charge point for you, certain personal data may be sent to the National Inspection Council for Electrical Installation Contracting (NICEIC) to confirm the installation meets the correct installation requirements and is recorded as part of the NICEIC requirements

When the installation of your charge point qualifies for a Government grant, certain personal data may be sent to the Office for Low Emission Vehicles (OLEV) as a requirement of the application process.

In the case of the non-payment of any amount owing to PNG, your personal data may be provided to a third-party debt collection agency. We will notify you before we do this.

Disclosure of your personal data in the event of a restructuring of PNG

If PNG buys or sells any part of its business or assets, we may disclose your personal data to a prospective buyer or seller of such business or assets, but on a strictly confidential basis.

If PNG or a substantial part of PNG's assets are acquired by a third party, customers' personal data held by PNG will be one of the assets transferred.

Changes to this privacy policy

PNG may make minor changes to this privacy policy in the future and will post these changes on the PNG website. If we make any major changes, we will take additional steps to inform you.

What are my rights with regard to my personal data ?

You have certain rights with regard to your personal data held by us :

- *Right to be informed* : you have the right to receive clear, transparent and understandable information about what personal data PNG holds, what we use the data for, who we will disclose it to and for how long we hold it. This privacy policy is intended to fulfil this right.
- *Right to access* : you can ask PNG to provide a copy of your personal data which we hold
- *Right to rectify* : you can ask us to correct any error you identify in the personal data we hold on you
- *Right of deletion*: you can ask us to delete the personal data we hold about you, at any time. We will follow your instructions unless we have a genuine reason not to do so, such as legal or taxation requirements or for the prevention of fraud.
- *Right to restrict processing* : you can ask us to stop using your personal data, although this may affect the level of service we provide you.
- *Right to object* : you can dispute our claim of legitimate interest in holding and processing your personal data

If you wish to exercise any of these rights, please contact us through the data privacy e-mail address below.

We may ask you for further information to confirm your identity, as a security measure, before we release your private data.

We try to respond to all requests within one month. If we think it is going to take longer, we will notify you and keep you updated.

Queries and exercise of your rights

If you have any queries about the personal data PNG holds and the way we process it or you wish to exercise any of the rights listed above, please contact us on :

dataprivacy@plug-n-go.com

If you are not content with the way we have dealt with your personal data, please send us a written complaint with details of the matter. This will be reviewed by a senior member of our management and we will reply.

If you remain unsatisfied you can make a complaint to the Information Commissioner's Office in the UK www.ico.org.uk or the Office of the Data Protection Authority in Guernsey www.odpa.gg