

# Privacy Policy

Our customers are at the centre of everything we do. So, as well as giving you excellent value and the best service around, we're committed to protecting your privacy.

This privacy policy relates to the products supplied to you by Bonnet Limited. These are Charge Anywhere, Dash and Alternator. The policy is here to help you understand what data we collect, why we collect it, and what we do with it. Please read carefully, because it tells you some important stuff – about how we handle your personal data, and the steps you can take to look after it.

## 1. Important information and who we are

Bonnet Limited trading as 'OVO' (company number 12281063) with registered address at 1 Rivergate, Temple Quay, Bristol, England, BS1 6ED is the responsible data controller (collectively referred to as **we, our, us** in this policy).

We are responsible for your personal information and, by law, we are required to provide you with information about us, about how and why we use and process your data and the legal rights you have as data subject.

So, if you're looking for more information on how we keep your information safe and how we collect, store, use and share your personal data, this is the right place for you!

We are not required by law to appoint a data protection officer (DPO), so any questions about this policy or our privacy practices, including any requests to exercise "your legal rights", shall be addressed to us via e-mail at [chargeanywhere@ovo.com](mailto:chargeanywhere@ovo.com)

## 2. Information we collect

For clarity and ease of reference, we've summarized the types of personal information we collect, our purposes for doing so, the third parties involved, and which of our products the data pertains to in the table below:

Data Category and Personal Information "PI" we collect	Business/commercial purpose for collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties with whom we "share" PI	Applicable Product(s)
<b>Identification data (if applicable)</b>  Name  Phone Number  Email  Company Information  Device ID  VAT Number  Home/Mailing address  Work address  Third-party source data	Providing, facilitating and improving the delivery of the Bonnet Services and Sites  Communicating with you about Bonnet Services and providing customer support  Improving the Bonnet Services and Sites  Sending marketing communications  Maintaining the security of the Bonnet Services and Sites  Displaying personalised advertisements  Carrying out other legitimate business purposes  Complying with legal obligations  Complying with KYC from our payment processing provider  Fraud prevention and security	Bonnet Service providers  Advertising partners  Professional advisors  Authorities and others  Business transferees	Advertising partners (to facilitate online advertising)	OVO Charge App  Dash  Alternator

Data Category and Personal Information "PI" we collect	Business/commercial purpose for collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties with whom we "share" PI	Applicable Product(s)
<b>Professional or employment - related data</b>  Registration contact  company information  Third-party source data	Providing facilitating and improving the delivery of the Bonnet Services and Sites  Communicating with you about Bonnet Services and providing customer support  Improving the Bonnet Services and Sites  Sending marketing communications  Maintaining the security of the Bonnet Services and Sites  Displaying personalised advertisements  Carrying out other legitimate business purposes  Complying with legal obligations  Complying with KYC from our payment processing provider  Fraud prevention and security	Bonnet  Service providers  Advertising partners  Professional advisors  Authorities and others  Business transferees	Advertising partners (to facilitate online advertising)	Dash  Alternator

<b>Data Category and Personal Information “PI” we collect</b>	<b>Business/commercial purpose for collection</b>	<b>Categories of third parties to whom we “disclose” PI for a business purpose</b>	<b>Categories of third parties with whom we “share” PI</b>	<b>Applicable Product(s)</b>
<b>Financial data</b>  Payment information  Apple pay payment information  Google pay payment information	Providing and facilitating delivery of the Bonnet Services and Sites  Carrying out other legitimate business purposes  Complying with legal obligations  Complying with KYC from our payment processing provider	Bonnet  Service providers  Professional advisors  Authorities and others  Business transferees	None	OVO Charge App  Dash  Alternator
<b>Internet or network data</b>  Device data  Service data  Location data  Background location data (if applicable)  Phone/SMS  Background data refresh  Mobile data  Device/app history	Providing facilitating and improving delivery of the Bonnet Services including widgets and sites  Communicating with you about the Bonnet Services and providing customer support  Improving Bonnet Services and Sites  Sending marketing communications  Maintaining security of the Bonnet Services and Sites	Bonnet  Service providers  Professional advisors  Advertising partners  Authorities and others  Business transferees	Advertising partners (to facilitate online advertising)	OVO Charge App  Dash  Alternator

Data Category and Personal Information "PI" we collect	Business/commercial purpose for collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties with whom we "share" PI	Applicable Product(s)
Visitation data	<p>Displaying personalized advertisements</p> <p>Carrying out other legitimate business purposes</p> <p>Complying with legal obligations</p> <p>Complying with KYC from our payment processing provider</p> <p>Fraud prevention and security</p>			
<p><b>Visual data and User-Generated Content</b></p> <p>Camera</p>	<p>Providing facilitating and improving delivery of the Bonnet Services</p> <p>Allowing you to scan the respective QR code of the charging station you are using</p> <p>Allowing you to take and upload photos to the platform</p> <p>storage, photos and/or media</p> <p>Carrying out other legitimate business purposes</p>	<p>Bonnet</p> <p>Service providers</p> <p>Business transferees</p>	None	OVO Charge App

Data Category and Personal Information "PI" we collect	Business/commercial purpose for collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties with whom we "share" PI	Applicable Product(s)
<b>Derived data</b>  Data derived from the above categories	Providing facilitating and improving delivery of the Bonnet Services and Sites  Improving the Bonnet Services and Sites  Sending marketing communications  Displaying personalized advertisements  Carrying out other legitimate business purposes  Fraud prevention and security	Bonnet  Service providers  Professional advisors  Advertising partners  Authorities and others  Business transferees	Advertising partners (to facilitate online advertising)	OVO Charge App  Dash  Alternator

For a brief description of our products:

- OVO Charge App: iOS and Android application for end-users.
- Dash: Fleet management dashboard for business clients.
- Alternator: An SDK solution for business clients.

While the table offers a concise overview, please note that the subsequent sections in this privacy policy provide more detailed descriptions and explanations about our data collection and processing practices.

### 3. Legal bases for processing

We will process your personal information lawfully, fairly and in a transparent manner. We collect and process information about you only where we have legal bases for doing so.

These legal bases depend on the services you use and how you use them, meaning we collect and use your information only where:

- it's necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract (for example, when we provide a service you request from us);
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services, and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose (for example, you might consent to us sending you our newsletter); or
- we need to process your data to comply with a legal obligation.

Where you consent to our use of information about you for a specific purpose, you have the right to change your mind at any time (but this will not affect any processing that has already taken place).

### 4. Collection and use of information

We may collect, hold, use and disclose information for the following purposes and personal information will not be further processed in a manner that is incompatible with these purposes:

- for technical assessment, including to operate and improve our app, associated applications and associated social media platforms;
- to provide you with our app and platform's core features;

- to process any transactional or ongoing payments;
- to enable you to access and use our app, associated platforms and associated social media channels;
- to contact and communicate with you;
- for internal record keeping and administrative purposes;
- for analytics, market research and business development, including to operate and improve our app, associated applications and associated social media platforms;
- to run competitions and/or offer additional benefits to you;
- or advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you; • to comply with our legal obligations and resolve any disputes that we may have; and
- to consider your employment application.

## 5. Disclosure of personal information to third parties

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, hosting and server providers (such as Amazon Web Services), ad networks, analytics (such as Google Analytics), app development platforms (such as Google Firebase), error loggers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators (such as Stripe);
- the organisation that has hired you as an employee or consultant, if you use our services for commercial purposes. This includes information about the charging points you have used, the volume of electricity you have consumed, the frequency of your charging sessions, among others, which may be disclosed either at aggregated



or individual level at Bonnet's sole discretion. Generally such information is used by commercial subscribers (in this case, your organisation) for business purpose such as assessing and monitoring how employees are using Bonnet's services (fe.g. are employees or consultants using the best route, are they being efficient in their driving, etc).

- our employees, contractors and/or related entities (on a "need to know" basis);
- sponsors or promoters of any competition we run;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you (this includes charge point operators).

## 6. International transfers of personal information

The personal information we collect is stored and processed in United Kingdom (UK), or where we or our partners, affiliates and third-party providers maintain facilities. By providing us with your personal information, you consent to the disclosure of your data to these overseas third parties.

We will ensure that any transfer of personal information to outside of the United Kingdom will be protected by at least one of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data (for example, this includes transfers from the United Kingdom to countries in the European Economic Area (EEA); or
- Where we use third-party providers outside of the UK or the EEA, we may use specific contracts approved for use in the United Kingdom or the EEA which give personal data the same protection it has in the UK or the EEA (for example, standard data protection clauses approved by the European Commission or the use of binding corporate rules or other legally accepted means).

## 7. Data Retention and Security

We don't keep personal information for longer than is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

While we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure and cannot guarantee absolute data security. If necessary, we may retain your personal information for our compliance with a legal obligation or in order to protect your vital interests or the vital interests of another natural person.

## 8. Your rights and controlling your personal information

### **CHOICE AND CONSENT**

By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this privacy policy. You do not have to provide personal information to us, however, if you do not, it may affect your use of our app or the products and/or services offered on or through it.

**ACCESS** (commonly known as a "data subject access request")

You may request details or a copy of the personal information that we hold about you. Where possible, we will provide this information in CSV format or other easily readable machine format.

## **RESTRICT**

You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict or limit how we process your personal information, we will let you know how the restriction affects your use of our app or products and services.

## **ERASURE**

You may request that we erase the personal information we hold about you at any time where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

## **DATA PORTABILITY**

You may also request that we transfer this personal information to another third party. In this case, we will transfer your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

## **CORRECTION**

If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

## **WITHDRAW CONSENT AT ANY TIME**

Where you consent to our use of information about you for a specific purpose, you have the right to change your mind at any time (but this will not affect any processing that has already taken place).

## **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **COMPLAINTS**

If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://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.

## **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **DIRECT MARKETING FROM US**

We may send you marketing communications from time to time about our new products and offers, provided that we obtain your consent to do so. If you have already purchased goods or services from us, we may send you electronic marketing communications about products we feel may interest you (based on your prior experience with us) if you have not opted out from that marketing messages.

### **THIRD-PARTY MARKETING**

We do not share your personal information with any third-party for marketing purpose and we will get your express opt-in consent if we decide at some point to do so.

### **UNSUBSCRIBE**

If you want to unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

## **9. Cookies**

Our privacy policy covers the use of cookies between your device and our servers.

A cookie is a small piece of data that an app may store on your device, typically containing a unique identifier that allows the app servers to recognise your device when you use the app; information about your account, session and/or device; additional data that serves the purpose of the cookie, and any self-maintenance information about the cookie itself.

We use cookies to give your device access to core features of our app, to track app usage and performance on your device, to tailor your experience of our app based on your preferences, and to serve advertising to your device. Any communication of cookie data between your device and our servers occurs within a secure environment.

## 10. Business transfers

If we or our assets are acquired, or in the unlikely event that we go out of business or enter bankruptcy, we would include data among the assets transferred to any parties who acquire us. You acknowledge that such transfers may occur, and that any parties who acquire us may continue to use your personal information according to this policy.

## 11. Limits of our policy

Our applications (including both app and website) may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites and cannot accept responsibility or liability for their respective privacy practices.

## 12. Changes to this policy

At our discretion, we may change our privacy policy to reflect current acceptable practices. We will take reasonable steps to let users know about changes by uploading a new version of this policy on the app and the website. We will send you an e-mail or post an update notice on our website so that you become aware of the updated version of this policy. Your continued use of our applications (including both app and website) after any changes to this policy will be regarded as acceptance of our practices around privacy and personal information.

If we make a significant change to this privacy policy, for example changing a lawful basis on which we process your personal information, we will ask you to re-consent to the amended privacy policy.