

#### GDPR Policy & Privacy Policy Purpose

This policy is in line with the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. We are firmly committed to protecting personal data provided to us, or we collect from you for our legitimate business interest.

This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or our clients. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

Motor Mover is a trading name of 'AV Innovate Ltd' (and 'we', 'us', or 'our') refers to 'AV Innovate Limited' (a privately held limited company registered in England under registration no. 04386919 and with its registration address at the below address).

What is personal data (GDPR definition) 'Personal Data' means any information relating to an identified or identifiable natural person ('Data Subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We may collect information about you in a range of forms, including personal data. As used in this Policy, this includes any information which, either alone or in combination with other information we hold about you, identifies you as an individual, including, for example, your name, postal address, email address and telephone number.

Relevant GDPR Articles to personal data are 2,4,9 and 10. (see ICO personal data page)

### What does this privacy policy cover?

This privacy policy addresses how Motor Mover Ltd (AV Innovate Ltd). processes personal information. Our data processing activities include the following:

- 1. Business contacts (current and new clients).
- 2. Individuals whose personal data we obtain in connection with servicing our clients.
- 3. Others who get in touch with us.
- 4. Personnel (partners, employees and contractors).
- 5. Recruitment applicants.
- 6. Suppliers (including subcontractors and individuals assisting us delivering our business service).
- 7. Visitors to our website. (Personal information you provide when using our website).

#### Collection and use of personal data

Motor Mover Ltd (AV Innovate Ltd) processes personal data about contacts (current and new clients and/or associated individuals) using office software products from Microsoft, Apple and Google. The collection of personal data types include 'name', 'address', 'telephone number', 'email address', 'organisation name', 'record of interactions', and other data required to fulfil our business objectives.

Personal data relating to business contacts may be used for our legitimate interests for the purposes of 'administering, managing and developing our businesses and services' (eg managing business relationships, administering our systems, applications and website; performing business analysis) and 'providing information about us and our range of services' (eg providing information what might be of interest about us and our services).

Motor Mover Ltd (AV Innovate Ltd) does not sell or otherwise release personal data to third parties for the purpose of allowing them to market their products and service

## Security

We take the security of all data we process very seriously. We use industry standard physical and procedural security measures to protect information from the point of collection / receiving to the point of destruction. This includes encryption, firewalls, access controls, policies and other procedures to protect information from unauthorised access.

# What personal information do we collect about you

We collect and process personal data about you when services and products are procured from us. The personal data we process includes parts of the following:

- · Your name, work address, work telephone number and email address
- · With certain clients, personal home address and telephone number.
- · Your bank account details where invoices are submitted;
- Information related to the browser or device (through IP address and cookies) you use to access our website:
- $\cdot$  And/or any other information you provide.



## How do we use this information and what is the legal basis for use?

We process the personal data for the following purposes:

- To fulfil our business contract with you. This may include communicating with you on an 'economic activity' purpose provisioning a range of services. We require this information to enter into a contract with you and are unable to do so without it:
- To comply with applicable law and regulation;
- In accordance with our legitimate interests in protecting Motor Mover Ltd (AV Innovate Ltd) business interests and legal rights, including but not limited to: use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- With your express consent to respond to any business activity that you engage with us or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our services to you;

### Data Retention

We retain your personal information for as long as necessary to provide services and solutions to fulfil the contracted business transaction between us and for other essential purposes such as: complying with our legal and compliance obligations; maintaining business and financial records; maintaining security; resolving disputes; enforcing agreements.

# Right of Access

You have the right to obtain information about the personal data we store about you at any time and to receive a copy of it. We may charge for a request for access in accordance with applicable law. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits (currently 30 days).

You also have the right to confirm whether or not personal data concerning you is being processed; to have any data held about you rectified or erased, subject to our legal rights and obligations to retain the same; to restrict the processing of personal data in certain circumstances (for a period where accuracy is contested; where data is no longer required for processing, but is required for business or legal reasons; you do not agree with our assessment that the processing is permitted for our 'legitimate interests', for a period while verification is carried out as to whether those interests override your own interests).

### Changes to this privacy statement, contacting us

We recognise that transparency is an ongoing responsibility, so we will keep this privacy statement under regular review. Should you have any queries regarding this Privacy Notice, the processing of your personal data or wish to exercise your rights, please contact us on <a href="mailto:accounts@motormover.com">accounts@motormover.com</a> if you are not satisfied with our response, you can contact the Information Commissioner's Office ('ICO'). The ICO is the UK data protection regulator/supervisory authority. For further information on your rights and how to complain to the ICO, see please refer to <a href="https://www.ico.org.uk">www.ico.org.uk</a>.

