

MOBILE APPLICATION PRIVACY NOTICE CHARGE SAINT

PLEASE READ THIS NOTICE CAREFULLY

IMPORTANT INFORMATION AND WHO WE ARE

S4EV Ltd, a company registered in Scotland (Registered Company No. SC739047) and the owner of "Charge Saint" App, (**we**) are committed to protecting and respecting your privacy.

This notice (together with our End-user Licence Agreement (**EULA**) and any additional terms of use incorporated by reference into these documents) applies to your use of:

- "Charge Saint" mobile application software (**App**), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the documentation and services accessible through the App (**Services**), unless the EULA states that a separate privacy notice applies to a particular Service, in which case that privacy notice only applies.

The App allows users to upload photographic evidence and other information of electric vehicle (EV) charge point parking infringements (**Submitted Information**). We send Submitted information to our customers who are electric vehicle charge point operators (**Operators**) and Local Authorities (**Authorities**) ("our Customers") in the UK. This allows our Customers to enforce parking restrictions.

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read this carefully. If you have any questions about how we process your personal data please contact support@chargesaint.com

OUR ROLE

For the purpose of Data Protection Law, we are the Data Controller of personal data collected from your use of the App. Any reference to the Data Protection Law means (while they remain in force and applicable in the UK) the Data Protection Act 2018, the UK General Data Protection Regulation (GDPR), and any other laws and regulations relating to the processing of personal data in the UK.

INFORMATION WE COLLECT FROM YOU AND HOW WE USE IT

We will collect and process the following data about you:

- **Information you give us to register with the App (Contact Information):**
This is information you give us about you when registering to use the App or when you fill in a form on the App to report a problem. The information you give us may include your name, e-mail address and username.

Our legal basis for processing Contact Information to allow you to use the App is that it is in our legitimate interests as well as your legitimate interests in that it is necessary in order for you to use the App and for it to fulfil its purpose in addressing misuse of electric vehicle charging points.

- **Information we collect about you and your device.** Each time you use our Apps we will automatically collect the following information:
 - **Usage information.** Details of your use of our App. Our legal basis for processing Usage information is legitimate interest. It is important for us to understand how our App is being used so we can improve it; and
 - **Location information.** We use GPS technology to determine your current location and geo-tagged photographs you upload ("Geo-tagged Photographs"). This enables us to determine the location of the parking infringement. Our location-enabled Services require your coordinates, for the feature to work. If you wish to use the App, you will be asked to consent to your location being used for this purpose. The location-enabled Services are only monitoring your Device location when you are using the App. When the App is closed, or running in the background, we do not collect location information. You can withdraw your consent at any time by contacting us at: support@chargesaint.com or changing your location settings on your device.

DISCLOSURE OF YOUR INFORMATION

We will disclose the data we collect from you to the following third parties:

| Category of data | Recipient | Purpose |
|--|--|--|
| Submitted Information (This does not include your personal data) | Our Customers | Identifying parking infringements and enforcing any appropriate measure. |
| Geo-tagged Photographs (This does not include your personal data) | Licence Plate Recognition Service Provider | To identify the vehicle which is the subject matter of your photographs. |
| All information | Our Customers | Identifying parking infringements and enforcing any appropriate measure. |

In addition, we may disclose your personal information to third parties:

- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its users will be one of the transferred assets. It is likely however that in such circumstances we shall anonymise all personal data as far as possible before disclosing the same to a prospective seller or buyer.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
 - enforce or apply the EULA, and other agreements you have agreed to with us or to investigate potential breaches; or

- protect the rights, property or safety of S4EV Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on secure servers in Ireland, which is deemed by the UK Government as having an adequate level of protection for personal data given it is part of the EEA. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

HOW LONG WE WILL KEEP YOUR DATA FOR

We will retain your data for no longer than the purpose for which we require to process it to deliver the App.

You can ask us to delete your data: see *Your Rights* below for further information.

YOUR RIGHTS

You have the following rights:

- Where we rely on consent, you can withdraw your consent to us processing your data for use with the App at any time by contacting us at: support@chargesaint.com or removing the App from your device. Please note that if you do this you will no longer be able to use the App. Also any withdrawal of consent will not affect our processing up to the date of withdrawal.
- You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you think that we have infringed your rights. You can find more information about reporting a matter to the ICO at the following link: <https://ico.org.uk/>.
- You have the right to access information held about you. You can access your personal data and correct, update or delete it by accessing the App and making any amendments as necessary. Otherwise you can contact support@chargesaint.com
- In certain circumstances you have the right to ask us to provide you with your information in a structured, commonly used and machine-readable format to allow you (or us on your behalf) to transmit this information to another party. More information can be found at <https://ico.org.uk>
- In certain circumstances you have the right to object to us processing your data or ask us to restrict, rectify or erase the data we hold about you. More information can be found at <https://ico.org.uk>

THIRD PARTY LINKS

The App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App is advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and

that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

CHANGES TO PRIVACY NOTICE

We keep our Privacy Notice under regular review.

Any changes we may make to our privacy notice in the future will be posted on the App and, where appropriate, notified to you when you next start the App. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App.

CONTACT

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to: support@chargesaint.com

Last updated: June 2023