



## Privacy Notice - General users and clients

### Introduction

CarPro Systems ("CarPro") takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact:

[PrivacyTeam@CarProsystems.com](mailto:PrivacyTeam@CarProsystems.com)

Our personal information handling policy and procedures have been developed in line with the requirements of General Data Protection Regulation (in force from 25 May 2018).

For Our Website

### 1. What information do we collect?

We collect personal data on behalf of the clients of our customers to provide services. Also, sometimes we collect personal data from employees of customers and clients.

The personal data that we collect are appropriate, relevant, and not excessive in relation to the purpose for which they are collected. The personal data to which CarPro will have access will be personal data of the clients of our customers.

We may collect the following types of personal data:

- Identification data: Such as full name, address, telephone number, email address.
- Personal characteristics data: Such as place of birth and nationality.
- Financial data: Such as credit card numbers.

We collect and process personal data about you when you interact with us and when you visit our site, and in connection with other activities, services, features or resources we make available on our Site.

We receive personal data from clients during the course of their relationship with us or our customers. This will usually be through the forms and documents used when our customers or clients upload or enter data in our application to access any of our products and services.

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



We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

We process the personal data listed in paragraph 1 above for the following purposes:

- For administrative purposes in relation to the security and access to our systems.
- To identify persons authorized to use our system and make requests.
- To contact the user regarding his or her account and services.
- To respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to provide demo to you, feedback about our website or our products or services;
- To meet laws and regulations for services provided.
- To maintain business records as required to meet legal or regulatory requirements.
- We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication or clicking the unsubscribe option on the website.

## CarPro Website

We do not collect any personal data from visitors browsing our website, although personal information may be requested via the website if a visitor chooses to contact us or asks for a demo or apply for any of the jobs posted on our website.

We can collect information from visitors that is not linked to an identifiable individual. Examples include the Internet browser of the visitor, the type of operating system, and other information to help us to improve the flow and interconnectivity of our site.

## Web browser cookies

Our Site may use “cookies” to enhance User experience. User’s web browser places cookies on their hard drive for record-keeping purposes and



sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

### 3. With whom and where will we share your personal data?

We do not sell, trade, or rent Users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

We share your personal data with the below third parties:

- marketing and communications agencies where they have agreed to process your personal data in line with this Privacy Notice;
- search engine and web analytics.

Such third parties include, but are not limited to, providers of website hosting, maintenance, customer support and identity checking.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

We reserve the right to disclose your personal information when we believe release is appropriate to comply with a legal obligation or legal process; or to protect the rights, property, or safety of CarPro, our employees, our users, or others.

By submitting any information to us, you agree to the storage and processing of data which may be outside the EU and EEA countries. European residents should note that the data protection laws in countries outside the European Union and other countries, may not offer an equal level of data protection that is available under the laws of your country, including in the European Union. CarPro will take reasonable measures to ensure an adequate level of protection of the personal data in its possession, as described more fully below. You expressly consent to such cross-border disclosure, but only for a purpose directly connected with the services we provide or for a purpose permitted by this privacy policy.



#### 4. How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. You have the option to withdraw the consent and even ask for deletion of data by clicking the relevant links on the website.

In the case of any contact you may have with our customer services team, we will retain those details for as long as is necessary to resolve your query and for two weeks after the query is closed.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place.

#### 5. Where is my data stored?

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place.

#### 6. How we protect your information?

We have implemented necessary technical and organizational measures to maintain the security of personal data and avoid their alteration, loss and unauthorized processing and access. These measures consider the state of art, the characteristics of the stored data and the risks to which they are exposed, whether they come from human action, from the digital, physical, or natural environment, as established by internal policies and procedures and by law and regulation.

We have also implemented additional security measures to reinforce the confidentiality and integrity of the information and maintains supervision, control, and evaluation of the processes to ensure the privacy of personal data.

Our employees who may have access to personal data on behalf of CarPro are made aware of the importance of keeping it confidential. CarPro internal procedures in complying with our policies oversee the adherence to our policies and report findings in a timely manner.



## 7. What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication, like newsletter, we have sent to you or by contacting us.

Where you have given us consent to use your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

## 8. Where can I find more information about CarPro's handling of my data?

Should you have any queries regarding this Privacy Notice, about CarPro's processing of your personal data or wish to exercise your rights you can contact CarPro's Privacy Team using this email

address: [PrivacyTeam@CarProsystems.com](mailto:PrivacyTeam@CarProsystems.com). If you are not happy with our response, you can contact the Information Commissioner's

Office: <https://ico.org.uk/>



## Privacy Notice - Job applicants

### Introduction

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Unless we inform you otherwise during the recruitment process, CarPro will be your data controller and will be the company to which you provide your consent for the processing of your personal data.

Our personal information handling policy and procedures have been developed in line with the requirements of General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

### 1. What information do we collect and process?

We collect and process personal data about you when you apply for a job with us.

The personal data we process includes:

- your name, home address, email address and/or phone numbers;
- your date of birth, marital status, nationality and National Insurance number (where you provide this to us);
- your educational and employment history;
- other information contained within your CV or other documents or information you submit to us;
- information from the selection process, if any;
- references and assessments relating to your work for previous employers;
- medical and financial information (where you provide this to us);
- information to confirm your identity and right to work, such as a copy of your passport;
- details of any unspent criminal convictions; and
- information relating to your feedback on our organisation.
- With your specific consent, information relating to your ethnicity, gender, nationality, disability, religion, sexual orientation and other diversity-related information.



## 2. What is the source of this information?

We obtain this information directly from you, our personnel, through our systems and equipment, as well as from third parties such as recruitment agencies, background checking companies or former employers. We may also obtain it from your public profiles available online.

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

We process the personal data listed in paragraph 1 above for the following purposes only in accordance with our legitimate interests:

- to enable us to comply with our legal and regulatory obligations;
- to make recruitment decisions;
- to prevent and detect fraud and other wrongdoing;
- to establish, exercise or defend our legal rights; and
- to manage risk

## 4. With whom and where will we share your personal data?

We may share your personal data for the purposes of intra-group administration. We may also share your personal data with our professional advisors such as our auditors and external legal and financial advisors.

Personal data may be shared with government authorities and/or law enforcement officials if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of CarPro for the purposes above. In the event that any part of our business is sold or integrated with another business, your details may be disclosed to our advisors and those of any prospective purchaser and would be passed to the new owners of the business.

## 5. How long will you keep my personal data?

We will not keep your personal information for longer than is necessary and will only retain the personal information that is necessary to fulfil the purpose. We are also required to retain certain information by law or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.



We will keep the personal data connected to your job application (including any interview records) for 6 months from the date of their creation by CarPro or receipt from you. If your application is successful and you become a member of

staff we will provide you with a copy of the Staff Privacy Notice. The retention periods referred to therein will apply to your personal data during your employment.

## 6. Where is my data stored?

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the other country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place. Further information may be obtained from our Privacy Team.

## 7. What are my rights in relation to my personal data?

Where you have given us consent to use your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) we haven't handled your personal data in accordance with our obligations.

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