

Motion Energy Privacy Policy

Last updated: June 2022

Motion Energy (or just we, us or our) is registered in Australia as Motion Energy Group Pty Ltd using Australian Company Number 638 846 107 and in the UK as Motion Energy Group Limited using Company Number 12616805.

While carrying out our business, us and our subsidiaries and related companies will collect, store, use and disclose personal information. We are committed to the protection of your personal information and to compliance with applicable privacy laws. This privacy policy has been developed to transparently communicate what data we collect and why and explain our data privacy and security processes to keep this data safe.

Personal information

Personal information and/or personal data (the terms commonly used in applicable privacy laws), is information or an opinion about an identified or reasonably identifiable individual, whether or not the information or opinion is true and whether or not the information is recorded in a material form.

Types of personal information we collect and hold

We collect and hold personal information about you in order to provide our product and service (including our websites and other online platforms and services) and purposes connected to those products and services.

To provide our product and service, the types of personal information we may collect, and hold includes:

- (a) *Identity and contact details* – including your name, address, telephone number, email address and other documentation that relates to your identity, such as your drivers' licence, passport or other national identity documentation details;
- (b) *Location and GPS information* – including location information from real-time signals and past activity related to the use of our products and services;
- (c) *Metadata* – metadata (such as time, location, and other settings) related to your use of our websites, platforms, products, and services;
- (d) *Profile data* – profile information, usernames, preference data, and related information; and
- (e) *Other information* – data relating to the use of electric vehicles (to the extent such data is personally identifiable), text of communications gathered when we communicate with you, including on social media, live chats or emails, and other information from your interactions with us online, including cookie information, security tokens, IP address, URLs, search histories and other associated information.

In accordance with the General Data Protection Regulation (GDPR for short, which for the purposes of this policy, includes the UK-GDPR) we only process your personal information with your consent and to enable us to provide you with the products and services you have asked us to provide. If, in the unlikely event that we ask you to provide us with personal information that you would prefer not to provide, unfortunately, we may not be able to provide you with our product or service.

How we collect and hold personal information

We may collect personal information directly from you in the course of providing our products and services, including correspondence, from our websites and other online platforms, from media and publications, mailing lists, marketing, events, and/or directly from you, including using cookies (data files placed on your device or computer), log files and security tokens.

Your personal information is held securely and is held only for as long as the information remains relevant to provide you with our products and services.

We take reasonable steps to ensure the security and integrity of the personal information we collect store, use and disclose including restricted server access, encryption and other industry standard security protocol like use of firewalls and complex password protection.

Links to other websites

Our website may contain links to other organisations' information and websites that we hope will be helpful and relevant for you. However, Motion Energy is not responsible for the information or activities of other organisations, even if accessed via the Motion Energy website. Please carefully read the privacy policy of websites you visit that are linked through our website.

Purposes for which we hold, use and disclose personal information

We will not use or disclose your personal information for reasons that do not directly relate to the provision of our products and services, except in circumstances where you either consent or would reasonably expect our use or disclosure.

Under the GDPR we are a 'data processor' and a 'data controller'. This means we determine the purposes and manner in which personal data is used (data controller) and process the personal data (data processor).

It is unlikely that we will need to collect sensitive data from you when we provide you with our products and services. To the extent there is a risk that any personal data we collect, transfer or disclose contains 'sensitive' data, we will undertake, or enter into agreements ensuring that third party processors undertake Data Protection Impact Assessments.

The purposes for which we collect, hold, use and disclose information may include:

- (a) conducting our business, which includes providing our services, undertaking our assessment activities, measuring benefits associated with the use of electric vehicles, enabling service agreements and establishment arrangements, and/or the services of a third party, to you;
- (b) to communicate information about our products and services or third party products or services that may be of interest to you;
- (c) to provide you with rewards and incentives whether monetary or otherwise;
- (d) to provide you with information or advertising relating to our products or services (including targeted advertisements) or marketing communications we believe may be of interest to you;

- (e) to improve and optimise our platforms (including our websites) and services;
- (f) for our internal administrative, research, planning, marketing and product development purposes; and
- (g) to comply with legal obligations.

We may also disclose personal information to third party partners (including our clients and customers) who help us deliver our products and services to you, as well as third party technology and marketing partners, including but not limited to Amazon Web Services and Google (including Google Analytics) and other technology and marketing service providers.

These third party partners may contact you directly, and their use of your personal information and/or any queries you have about the personal information they hold and how they are using it, will be governed by their privacy policy. So, please read their Privacy Policy carefully.

Changes to this Privacy Policy

We will review and update this Privacy Policy from time to time as needed without notice. Therefore, please review the terms of this policy periodically to make sure that you are aware of how we collect, hold, store and use personal information.

Retention, access and correction

We will only keep records of your personal information as long as they are still necessary for the purposes listed above for which we collected such personal information.

We will take all reasonable steps to ensure any personal data we collect, use or disclose is up to date and accurate. If you believe personal information that we hold about you is not up to date or accurate, please ask us to correct it.

You can ask us to provide you with details of the personal information we hold about you, and copies of that information. We will respond to your request and attempt to provide you with the data within 30 days of receipt of your request.

Please reach out to hello@motionenergy.com if you would like to request access to or correction of any of your personal information that we hold.

Some other rights in relation to your privacy

You may have a right, in certain circumstances, to have the information held about you erased. You can talk to us further about this at hello@motionenergy.com.

You can also request that we restrict or suspend the processing of your personal information. If you do so, please note that we may unfortunately no longer be able to provide our services to you.

If you are based in California, you may opt-out of third party sales.

The GDPR also provides that in some circumstances you may have a right to data portability, to withdraw your consent at any time, to object to data processing and to object to processing of data for marketing purposes.

International disclosure

In order to provide our services to you, we may disclose the information which we process to countries outside the European Economic Area (EEA) which is relevant to the GDPR. Regardless of the location of our processing, we will impose adequate data protection safeguards and implement appropriate

measures to ensure that your personal data is protected in accordance with applicable data protection laws.

For our Australian operations:

We may, while providing products and services, disclose personal information to overseas entities including by using overseas data servers to process information.

Those overseas entities are likely to be in the United States, the United Kingdom, the European Union and Canada.

Contacts and Complaints

If you think a breach of the *Privacy Act 1988* (Cth) might have occurred, please reach out to us using the contact details provided below and we will do our best to resolve your query or complaint.

If you don't think our response will be satisfactory, you may contact the Australian Privacy Commissioner at its website www.oaic.gov.au or by telephone on 1300 363 992.

If you're in the EU, you can contact the European Data Protection Supervisor at its website <https://edps.europa.eu/en> or by telephone on +32 2 283 19 00.

If you're in Canada, you may contact the Office of the Privacy Commissioner of Canada (OPC) at its website <https://www.priv.gc.ca/en/> or by telephone on 1-800-282-1376.

If you're in the UK, you may contact the Information Commissioner's Office (ICO) at its website <https://ico.org.uk/> or by telephone on 0303 123 1113.

If you're in California, you may contact the California Privacy Protection Agency (CPPA) at its website <https://cppa.ca.gov/>.

Contacting us

If you have any questions about this Privacy Policy and would like further information, please contact us at hello@motionenergy.com.