



Mina's Privacy Policy

Mina respects your privacy and is committed to protecting your personal data.

This privacy policy will inform you how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a PDF version of the policy here: [\[LINK\]](#). Please also use the 'Glossary' to understand the meaning of some of the terms used in this privacy policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

This privacy policy aims to give you information about how Mina collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, choose to receive our white paper, or purchase our products or services.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

CONTROLLER

Mina Digital Limited is the controller and responsible for your personal data (collectively referred to as "Mina", "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below:

Full name of legal entity: Mina Digital Limited

Email address: legal@mina.co.uk

Postal address: Unit 10, 1 Burton Road, Sheffield, S3 8BW (to be addressed to the General Counsel)

You 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). We would, however, appreciate the chance to deal with your concerns before you approach a regulator, so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated in February 2023. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Charging Data** includes energy supplier, energy supplier account number, tariff information, vehicle registration number, charge point serial number, MPAN, home address and consumption data.
- **Installation and Servicing Data** includes details that we and our partners may require to install and service an electric vehicle chargepoint, including information relating to your house, vehicle and electricity supply.
- **Contact Data** includes billing address, email address and telephone number.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions,

operating system and platform, and other technology on the devices you use to access this website.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Charging, **Installation and Servicing**, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - sign up to receive our products or services;
 - create an account on our website;
 - subscribe to our services or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [Cookie Policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:
 - Charging Data from electric vehicle chargepoint software providers and market information systems.
 - Installation and Servicing Data from our installation and servicing partners.

- Technical Data from analytics providers (including Microsoft Clarity), advertising networks, and search information providers.
- Contact and Transaction Data from providers of technical, payment and delivery services (such as Stripe based outside the UK and the Republic of Ireland).

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please see the definition of 'Lawful Basis' (found in the Glossary) to discover more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. Please contact us if you need further details of which specific legal ground we are relying on to process your personal data:

Purpose/Activity	Type of Data	Lawful basis for processing
Fleet Owner / Driver registration	Identity and Contact	Performance of a contract
Calculating and analysing driver energy consumption and paying drivers' electricity suppliers	Identity, Charging and Transaction	Performance of a contract
Processing and delivery of goods and services (including RFID cards)	Identity, Contact Data and Transaction	Performance of a contract
Hardware installation, service and maintenance	Identity, Installation and Servicing and Contact Data	Performance of a contract
Managing our	Identity, Contact and	Necessary to comply with a legal

relationship (e.g. notifying you about changes to our terms or asking you to take a survey)	Marketing and Communications	obligation and/or necessary for our legitimate interests (to keep our records updated and to study how users interact with our products and services)
Enabling you to partake in a prize draw, competition or complete a survey	Identity, Contact and Marketing and Communications	Performance of a contract with you and/or necessary for our legitimate interests (to study how users interact with our products/services, to develop them and to grow our business)
Administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity, Contact, Profile and Technical	Necessary to comply with a legal obligation and/or necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
Use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical and Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Make suggestions and recommendations to you about goods or services that may be of interest to you	Identity, Contact, Technical, Usage, Profile and Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

THIRD PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at legal@mina.co.uk.

When you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, experience or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For more information about the cookies we use, please refer to our [Cookie Policy](#).

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with Third Parties (as set out in the Glossary) for the purposes set out in the table (*Purposes for which we will use your personal data*) above, as well as third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the UK and the EU, so their processing of personal data will involve a transfer of data outside of the UK and the EU. Whenever we transfer your personal data out of the UK and the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK and EU which give personal data the same protection it has in the UK and the EU.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and the EU

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

More details of your rights can be found on [the ICO website](#) (for the UK). If you wish to exercise any of the rights set out above, please contact legal@mina.co.uk.

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.

10. GLOSSARY

LAWFUL BASIS

A party must have a lawful basis for processing personal data. The lawful bases that Mina use are:

- **Legitimate Interest**, meaning the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract**, meaning processing your data where it is 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.
- **Comply with a legal obligation**, meaning processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES include:

- Service providers acting as processors who provide IT and system administration services, including Microsoft Azure, Xero, SendGrid, Twilio, MongoDB Atlas and Stripe.
- Service providers acting as processors who assist with the processing and delivery of RFID cards.
- Installation and servicing partners acting as processors who assist with the installation and servicing of electric vehicle charge points installed in connection with Mina OneFleet®.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom, who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

For further details of our third parties, please contact legal@mina.co.uk.