Introduction

PRIVACY POLICY

This privacy policy sets out how LEVC MTech Limited (Company number: 08364891) (We, Us, Our or **GEELY AUTO UK**) uses and protects your personal data. This policy applies to all your interactions with Us including for example when you use Our website, when you register with Us, sign up to Our newsletter, purchase a product or service, take part in competitions and promotional offers, and sign up through offers on our social media pages such as Facebook, Instagram, LinkedIn, Google/YouTube and X (formally known as Twitter).

You download a copy of the policy here: Privacy policy

In addition to this notice, GEELY AUTO UK products and services may have their own privacy policies which describe in more detail how your personal data is used in a particular context.

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- 1. Important information and who we are

Privacy policy

This privacy policy gives you information about how GEELY AUTO UK collects and uses your personal data through all of your interactions with Us including when you use Our website, including any data you may provide when you register with Us, express an interest in our products or services, if you purchase a product or service or take part in a competition, promotion or survey, participate in discussion boards (or other social

media functions on or linked to our website or social media pages), and when you report a problem with our site.

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

Regarding the use of our website, it is not possible for you to visit our website without providing your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website. This is collected via the 'Essential Cookies' and is required for you to access our website and its content.

It is only necessary for us to process your data if you decide to use certain services or purchase goods e.g. if you complete the online contact form, or you consent to the use of Marketing cookies in accordance with our Cookie Policy which be found at https://www.geelyauto.co.uk/cookie-policy

Controller

GEELY AUTO UK is the controller and responsible for your personal data.

We have an appointed person 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 (paragraph 10), please contact us using the information set out in the contact details section (paragraph 11).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

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, any previous names, marital status, title, date of birth, and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- **Images and filmed footage** include images and footage that we take during events, campaigns or during other initiatives relating to our products or services.
- Financial Data includes bank account, payment card details, and payment information.
- **Interaction Data** includes confirmation of sale, contractual documentation such as online enquiries and complaint information.
- 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 but is not limited to internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Vehicle Data** includes the Vehicle Identification Number (VIN), Vehicle Registration Number, technical information, warranty information, repair and maintenance history.

- **Profile Data** includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you interact with and 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 which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

3. How is your personal data collected?

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

Your interactions with us. You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- · register an interest in our products or services;
- · apply for 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. Please see our cookie policy https://www.geelyauto.co.uk/cookie-policy for further details.
- Technical Data is collected from analytics providers such as Google based outside the UK.
- **Contact, Financial and Transaction Data** is collected from providers of technical, payment and delivery services such as Strive Group Limited.
- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources including (but not limited to):
 - o Dealers
 - Authorised repairers
 - o Regulators and other public bodies such as the Driver Vehicle Standards Agency
 - Lead Generation Providers/Dealer Matching Providers such as Carwow Limited
 - o Andersen EV Plc
 - Octopus Energy Group Limited

- Campaign Monitor PTY Limited
- Strive Group Limited
- **Identity and Contact Data** is collected from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract, we are about to enter into or have entered into with you and to provide you with the information, products and services that you request.
- Legitimate interests: We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you agree to direct marketing, register an interest in our products or services, or consent to the use of your image.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
Marketing, promotional, and communication purposes. It is likely that the images and filmed footage will likely be placed into the public domain including but not limited to in hardcopy publications such as leaflets and brochures, social media channels, and on our intranet or website.	Images and Film Footage data	 (a) Necessary for our legitimate interest (to promote our brand and our products and services). We rely on this basis where you appear incidentally or in a crowd. We make every effort to ensure that you are informed in advance that the filming/photography is taking place and how to avoid your image being taken. We also make efforts to minimise the privacy impact for example, by the use 'depth of field' and

		distance/framing to avoid direct identification. (b) Consent, having obtained your prior consent to capturing photographs and filmed footage where you are clearly and prominently identifiable.
To register your interest in our products and/or services including a request for a test drive and to administer your expression of interest.	(a) Identity (b) Contact	Consent, having obtained your prior consent to contact you about Our goods and/or services
To register you as a new customer	(a) Identity (b) Contact	Consent, having obtained your prior consent to contact you about our goods and/or services Performance of a contract with you
To process and delivery your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Managing your order To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries (c) communication with you in	 (a) Identity (b) Contact (c) Financial (d) Transaction (e) Vehicle (f) Marketing and Communications (a) Identity (b) Contact (c) Profile (d) Marketing and Communications 	 (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts from you) (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage and administer our relationship with you, to improve our services, offer relevant
relation to product recall(s) (c) The administration of promotions, discounts, special offers, and loyalty benefits.		promotion and enhance you EV ownership experience)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity(b) Contact(c) Profile(d) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

	(e) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity(b) Contact(c) Technical	 (a) 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 or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) 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)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	 (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications 	Consent, having obtained your prior consent to receiving direct marketing communications
To carry out market research through your voluntary participation in surveys	(a) Identity(b) Contact(c) Profile(d) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).
To provide aftersales services to you particularly in relation to the diagnosis, analysis, maintenance,	(a) Identity(b) Contact(c) Transaction	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

repair and servici	ng of your	(d) Vehicle	(c) Necessary for our legitimate interests	
vehicle.			(to keep our records updated and	
			manage our relationship with you).	

Direct marketing

When you complete your details on our website at the point when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from GEELY AUTO UK via EMAIL, SMS, TELEPHONE, POST. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences and by following the opt-out links within any marketing communication sent to you or by contacting us geelyautoUK-marketing@LEVC.com

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to order confirmations for a product/service warranty registration, appointment reminders, updates to our Terms and Conditions, checking that your contact details are correct.

Cookies

For more information about the cookies we use and how to change your cookie preferences, please see https://www.geelyauto.co.uk/cookie-policy

5. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table 'Purposes for which we will use your personal data' above.

- External Third Parties such as dealers, authorised repairers, promotional partners, service providers, and regulators, details of which are set out below:
 - Dealers details can be found on our website
 - o Authorised repairers details can be found on our website
 - Advertising and marketing partners and agencies including M3 Communications Limited
 - Campaign Monitor PTY Limited
 - o Strive Group Limited
 - o Andersen EV Plc
 - Octopus Energy Group Limited
 - o Driver Vehicle Standards Authority and other regulators and public bodies.

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. Independent Controllers and Promotional Partners

When you request contact through our website, express an interest in our products or services, make a purchase and/or take the benefit of a promotional offer/discount/special offer/loyalty benefit, we may share the information necessary to complete the transaction with the relevant third party i.e. dealers, authorised repairers, payment providers, or promotional partners. The type of transaction will determine the information that is shared but it will likely involve the sharing of your name, billing address, email address, and payment details. These third parties will act as independent controllers of the data we share with them which means

that they use your personal data for their own purposes and they are therefore responsible for the way in which they handle your data which will include the following:

- o **Dealers** collect and process customer data for vehicle sales, financing and marketing.
- Authorised Repairers collect and process data for service bookings, warranty claims and customer communications.
- Payment Providers collect and process data for payment processing, fraud prevention, and regulatory compliance.
- o **Promotional Partners** collect and process data for administering promotions, discounts, special offers, and loyalty benefits associated with a purchase of goods or services.

Each of these parties determines its own purpose and means of processing your personal data and is independently responsible for complying with applicable data protection laws.

We encourage you to review the privacy notices of these third parties to understand how they process your data. You should contact them directly to exercise your data protection rights in relation to their processing activities.

Contact details:

Organisation Type	Name	Contact Email	Address
Dealers & Authorised Repairers	Various Independent Dealers and Garages	Varies by location (details can be found on our website)	`
Payment Provider	Stripe, Inc Stripe Privacy Team	privacy@stripe.com	Corporation Trust Center, 1209 Orange Street, Wilmington, New Castle, DE 19801, USA
Promotional Partner	Andersen EV Plc	contact@andersen- ev.com	1 Stewartby Business Park, Broadmead Road, Stewartby, Bedfordshlre, MK43 9ND
Promotional Partner	us Energy Group Limited	dpo@octoenergy.com	UK House, 5 th Floor, 164-182 Oxford Street, London, W1D 1NN

7. International transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We may transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data, namely, Germany.
- We may use specific standard contractual terms approved for use in the UK which give the
 transferred personal data the same protection as it has in the UK, namely the International Data
 Transfer Agreement or The International Data Transfer Addendum to the European Commission's
 standard contractual clauses for international data transfers. To obtain a copy of these contractual
 safeguards, please contact us at gdpr@levc.com or link to Contact details (paragraph 11).

8. 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.

9. 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.

In some circumstances you can ask us to delete your data: see paragraph 10 below for further information.

10. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "subject access request"). This
enables you to receive a copy of the personal data we hold about you and to check that we are
lawfully processing it.

- Request correction of the personal data that we hold about you. This enables you to have any
 incomplete or inaccurate data we hold about you corrected, though we may need to verify the
 accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those
 of a third party) as the legal basis for that particular use of your data (including carrying out profiling
 based on our legitimate interests). In some cases, we may demonstrate that we have compelling
 legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see OPTING OUT OF MARKETING in paragraph 4 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a
 third party you have chosen, your personal data in a structured, commonly used, machinereadable format. Note that this right only applies to automated information which you initially
 provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us gdpr@levc.com

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.

11. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

• Email address: gdpr@levc.com

Postal address: 314 Midsummer Court, Milton Keynes, MK9 2UB

12. Complaints

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 the ICO so please contact us in the first instance.

13. 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 on 10 October 2025.

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, for example a new address or email address.

14. 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.