GEELY GENERAL PRIVACY POLICY

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This privacy policy sets out how Geely Auto Sales Ireland Limited (also referred to as "We", "Us", or "Our") uses and protects your personal data. This policy applies to all your interactions with Us including when you use Our website, including the Geely Auto UK Official Website, sign up to Our newsletter, purchase a product or service, take part in competitions and promotional offers, sign up through offers on our social media pages as well as interactions with our business partners and their employees.

You can download a copy of the policy here: Privacy policy

In addition to this notice, Geely 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 Sales Ireland Limited collects and uses your personal data through all of your interactions with Us including when you use Our website, including the Geely Auto UK Official Website, sign up to Our newsletter, purchase a product or service, take part in a competition, promotion or survey, take part in a competition, promotion or survey, provide Us with feedback, contact Us via email or other means or interact with 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 by the 'Essential Cookies' which 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 Cookie policy.

Controller

Geely Auto Sales Ireland Limited (company registered in Ireland, CRO number 827087, registered office at 6th Floor, 2 Grand Canal Square, Dublin 2, D02 A342, Ireland) ("Geely Ireland") is the controller responsible for your personal data under this policy. Geely Ireland is part of the Geely group and is the authorised national distributor of Geely vehicles in the Republic of Ireland.

Geely Auto UK Limited ("Geely UK") provides shared services support to Geely Ireland (see Section 6).

If you have any questions about this policy or wish to exercise your legal rights (Section 11), please contact us using the details in Section 12.

We have appointed a Data Protection Officer, who is responsible for overseeing compliance with this policy. You can contact our Data Protection Officer at GDPR@geelyauto.co.uk

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** includes images and footage that we take during events, campaigns or during other initiatives relating to our products or services.
- **Health Data** including dietary requirements/preferences and mobility or accessibility needs.
- **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.
- **Dealer and Business Contact Data** includes name, job title, employers details, business email address, business phone number, training and certification records, communications with us, and information relating to the management of our business relationship.

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 your 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;
  - register for events such as product launches, customer showcases, and other promotional activities; 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 for further details.
  - **Technical Data** is collected from analytics providers such as Google based outside the EEA.
  - **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):
    - Authorised Dealers
    - Authorised repairers
  - **Identity and Contact Data** is collected from publicly available sources such as Companies House and the Electoral Register based in Ireland and the United Kingdom.

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 from us.
- **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.

Some of the data we collect - in particular Health Data (such as dietary, mobility or accessibility needs) - is "special category" personal data, which receives additional protection. Where we process special category data, we do so only on the basis of your explicit consent (Article 9(2)(a) GDPR), which you may withdraw at any time.

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 on Our website, social media pages, be used in Our brochures, publications such as leaflets and brochures, social media channels, and on our intranet or website.	Images and Film Footage data	Necessary for our legitimate interest (to promote our brand and our products and services). We will only use images 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 on you, for example by: use depth of field and distance/framing to avoid direct identification; Where practical, 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. To register you as a new customer	(a) Identity (b) Contact (a) Identity (b) Contact	Consent, having obtained your prior consent to contact you about Our goods and/or services 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	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Vehicle (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to recover debts from you)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) communication with you in relation to product recall(s) (d) The administration of promotions, discounts, special offers, and loyalty schemes	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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 record your relationship with you, to improve our services, offer relevant promotion and enhance you EV ownership experience)
To enable you to partake in promotional events which will include: (a) Manage event invitations, registrations, and attendance (b) Communicating with you before the event with joining instructions (c) Ensure that any special requirements are accommodated appropriately (d) Ensure the event is organised safely and effectively (e) Understand engagement and interest in our products and services (f) Comply with legal and regulatory obligations	(a) Identity (b) Contact (c) Profile (d) Health	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests in organising and conducting our products and services. (c) Consent, having obtained your prior consent to use your Health Data.
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(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)
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, marketing, 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, repair and servicing of your vehicle.	(a) Identity (b) Contact (c) Transaction (d) Vehicle	(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 our relationship with you)
To establish, administer and manage relationships with authorised dealers, dealer employees, authorised repairers and business partners.	Identity Contact Profile Communications	Necessary for our legitimate interests, namely operating, supporting, monitoring and managing our authorised dealer network, distributorship arrangements, training requirements and business relationships.

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 Ireland 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.

Automated decision-making

We do not make decisions that produce legal effects concerning you, or similarly significantly affect you, based solely on automated processing. Where we use profiling to send you relevant marketing, you can object at any time (see Section 11).

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

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 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.
- 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.
- Within our group of companies, including Geely Auto UK Limited and other affiliated Geely group companies where necessary.
- Inter-company data transfers between LEVC Mech Limited and Geely Auto UK Limited

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. Shared Services and Group Support

Geely Ireland and Geely Auto UK Limited ("Geely UK") operate certain functions on a shared-services basis. As a result, your personal data stored in Ireland is accessed and processed by employees and contractors of Geely UK in the United Kingdom, where necessary to provide the following services to Geely Ireland: operational, administrative, IT, legal, compliance, marketing, customer support, governance and business-management services. This involves a transfer of personal data to the United Kingdom, which we make on the basis described in Section 8.

Access is limited to individuals who need the information to perform their duties and is subject to appropriate technical and organisational security measures.

7. 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 you provide with the dealer to facilitate the transaction with the relevant third party e.g. dealers, authorised repairers, payment providers, promotional partners or vehicle breakdown and recovery service providers. 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:

- **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.
- **Promotional Partners** – collect and process data for administering promotions, discounts, special offers, and loyalty benefits associated with a purchase of goods or services.
- **Breakdown Service Partners** – collect and process data for administering a vehicle breakdown and recovery service.

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.

8. International transfers

Some of the recipients of your personal data (including other Geely group companies and our service providers) are located outside the European Economic Area (EEA). Transferring personal data outside the EEA – including where personal data held in Ireland is accessed remotely from outside the EEA – is a "restricted transfer" under the EU General Data Protection Regulation (GDPR), and we only make such transfers where one of the following safeguards is in place:

- **Adequacy:** We transfer personal data to the United Kingdom, where it is accessed and processed by Geely Auto UK Limited and its staff (see Section 6). The European Commission has decided that the United Kingdom provides an adequate level of protection for personal data (adequacy decision of 28 June 2021, renewed on 19 December 2025 to 27 December 2031), so these transfers do not require additional safeguards. We also transfer personal data to other countries covered by a European Commission adequacy decision.
- **Standard Contractual Clauses:** Where we transfer personal data to a country outside the EEA that is not covered by an adequacy decision, we use the European Commission's Standard Contractual Clauses, together with any additional measures identified by a transfer impact assessment. [For the United States recipient named in Section 7 (Stripe, Inc), insert the actual basis we rely on (Stripe's certification under the EU-US Data Privacy Framework / the EU Standard Contractual Clauses).]
- **Binding Corporate Rules**, where used within the Geely group.

To obtain a copy of the safeguards we use, please contact us at GDPR@geelyauto.co.uk, or using the details in Section 12.

9. 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.

10. 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 Section 11 below for further information.

11. 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, machine-readable 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 consent as the legal basis for using your personal 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.
- Complain about how we handle your personal data - see section 12 below

If you wish to exercise any of the rights set out above, please contact us GDPR@geelyauto.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.

12. 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@geelyauto.co.uk
- Postal address: 6th Floor, 2 Grand Canal Square, Dublin 2, D02 A342
- Telephone number: 0800 056 9999

13. Complaints

You have the right to make a complaint at any time to the Data Protection Commission (DPC), the Irish supervisory authority for data protection (www.dataprotection.ie; 6 Pembroke Row, Dublin 2, D02 X963). We would, however, appreciate the chance to deal with your concerns first, so please contact us in the first instance using the details in Section 12.

14. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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.

15. 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.