

Clear Flow Charging Ltd Privacy Notice

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Protecting Your Privacy

At Clear Flow, we are 100% committed to protecting the privacy and security of our suppliers, clients and client site visitors (Technicians). We appreciate and respect how important privacy is. If you have any questions about how we protect your information, please

Email: info@clearflowcharging.com

Our Privacy Policy outlines how we use your personal data, whether you are a client/user of our service, a supplier or you are visiting our website.

In order to either continue working with you or start a new relationship there is some personal data that we need to use. This depends on the type of data and the reason we are processing it, however, if you refuse to provide us with this data, we might not be able to fulfil our contractual requirements or, in some cases, might not be able to continue with our relationship.

It is important for you to know that we may make alterations to this Privacy Policy from time to time.

Clients/customers:

What personal information do we collect?

We use information to aid mutual business between our organisations but treat all information securely and confidentially.

The kind of contact information that we use includes: **company name, contact names, email addresses; fixed addresses; landline numbers, mobile numbers and general contact details**, this is all to ensure that our relationship can continue.

How we use your personal information

Clear Flow Charging's purpose to you is to facilitate your purchase of EV equipment for your personal / company use. We will manage your data in the following ways:

- We may store your details on a CRM system, so we can contact you about any business and keep notes on our dealings, updating your details when we need to.
- Using your information to send you information for your purchase and installation, your information will need to be shared with our site technicians.
- Possibly using the information, to contact you in due course to check you are happy with our products and ongoing service.

We may use your personal data for the above reasons if we feel it necessary to do so for our legitimate interests and the sole purpose of fulfilling your purchase requirements. If you are not happy regarding this, you have the right to object by contacting us at info@clearflowcharging.com

Sharing your information

We will use your information internally to provide you with a professional and user-friendly service.

Unless you object, we may share your information with any companies within our group in order to provide the best possible service to you.

Retaining your information & for how long?

We will delete your personal information from our systems if we have not had any significant contact with you, after a 7 year period. Significant contact could be either verbal or written contact.

Suppliers:

What personal information do we collect?

If you are a supplier, we collect the following kind of data from you. We collect **name; email address; addresses; landline numbers, mobile numbers, bank details (for payments to you) and general contact details**. This may also include any contracts that we have arranged together. Bank details are kept securely within our passworded Banking Application.

The information we collect is, so our organisations can mutually work together.

Collecting your personal data

Clear Flow Charging want to ensure that our organisations continue to trade mutually and beneficially. The data will either come from you, where you have contacted us to discuss supplying our business, this could be via telephone or email. Alternatively, we contact you by telephone or email to discuss your services.

How we use your personal information

- We may store your details on a CRM system, so we can contact you about any services that you are currently providing or could provide, updating your details when we need to.
- To use services from you

Sharing your information

In order for you to deliver a service to us we, unless you object, may share your information with any companies within our group in order to for you to provide wider services

Retaining your information & for how long?

We will delete your personal information from our systems if we have not had any significant contact with you, your company or other company representatives, after 7 years has passed. Significant contact could be either verbal or written contact. Should you as an individual leave the Company if we are informed, we will remove your individual information but not that linked to the company, including information relative to orders or similar.

Website users:

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 and last name.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **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.

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. In this case, we may have to cancel an order you have placed with us, but we will notify you if this is the case at the time.

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, 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:

- apply for our products;
- subscribe;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may 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.

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 or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to 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 just email info@clearflowcharging.com

Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use 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.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please email info@clearflowcharging.com

if you need details about the specific legal ground, we are relying on to process your personal data.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Individual or Company Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

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

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contact us at any time.

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

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.

Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out above.

- Internal Third Parties.
- External Third Parties.

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 notice.

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.

Data Retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Information for all Categories of Individuals:

Clear Flow's legal bases for processing your information

Clear Flow confirm that 'legitimate interest' is the most appropriate way for us to process and control your data. We have looked and assessed where we process the data and for what purpose. In the areas below, we feel that by using legitimate interest, it will enhance the service we provide and will not impact on your rights.

Legitimate Interest

Clients

In order to run your account and give you a reliable service, we need your corporate information as well as some of your employee's personal details such as numbers, emails etc as appropriate. Without this information it is extremely unlikely that we could offer you a coherent service. We also need your information to send invoices for our services, to setup any contractual obligations between us / or our organisations and discuss general business between us or our companies.

Suppliers

In order to run our business, we need you! Without certain information that our two organisations share between each other, we will not be able to use your services. Therefore, to ensure we help you grow your business and for us to use your expertise, products or services we need some personal details to make the relationship work.

Consent

Sometimes we will ask you for your consent to use your data, however, we feel that most of the data we process is processed under legitimate interest.

We will contact you and make it clear if we feel that we need consent to use your data. The consent part of the regulation means that:

- Clear Flow Charging need to gain your consent freely – we cannot force you into it
- We need to let you know what you are consenting to
- We will allow you to have control over which data we use and what data you do not want us to process.
- To give consent to us, you will need to make it clear – this could be replying to a correspondence, email, letter or completing a registration form.

All the above consent will be stored on our systems. You can withdraw your consent at any time.

Your rights

The GDPR regulation allows the data subject (you) rights in relation to your personal data and information. Below is information on how to get in touch with us and if you are not happy, who to contact. Any requests made by you will be actioned quickly and within a one-month period.

If you have a complaint, have any questions or wish to withdraw your consent to the processing of your personal information (where consent is our legal basis for processing your personal information), please contact us at info@clearflowcharging.com

You have the right to complain to your data protection regulator — in the UK, the Information Commissioner's Office (ICO). The contact details are Wycliffe House, Water Lane, Wilmslow SK9 5AF, 0303 123 1113 and email casework@ico.org.uk.

IT Security

All IT information held by Clear Flow Charging is securely stored using the latest IT security software and password protection including firewalls and virus protection.

Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised individuals have access to the information provided by individuals, potential clients, current clients, and suppliers.

Changes to Privacy Page

We may make changes to this page; this might be in relation to how we are processing your information.

Our Current Privacy Policy can be found by emailing info@clearflowcharging.com for a copy to be sent to you.

Want to contact us?

You can contact us via email at info@clearflowcharging.com