

COMMA OIL & CHEMICALS LIMITED

TRADING AS MOOVE LUBRICANTS

PRIVACY POLICY

Comma Oil and Chemicals Limited trading as Moove Lubricants (“we”, “us”, “**Moove Lubricants**”) respects privacy and is committed to protecting personal data that is shared with us. This privacy policy explains how we look after personal data.

This privacy policy applies to our customers who purchase our products, suppliers, prospective customers and suppliers, members of our membership programmes and to visitors to our website.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy explains how Moove Lubricants collects, stores and processes personal data and for which purposes.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific areas of our website or 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 personal data. This privacy policy supplements the other notices and is not intended to override them.

Please read the following carefully to understand our views and practices regarding personal data and how we will treat it. By using our website or purchasing our products, you consent to the collection, use, storage and disclosure of personal information as set out in this policy.

CONTROLLER

For the purposes of this privacy policy, Moove Lubricants is a data controller and is responsible for your personal data.

We have appointed a data protection officer (“DPO”) 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 DPO using the details set out below.

CONTACT DETAILS

Our full details are:

Name of legal entity: Comma Oil & Chemicals Limited

Name: Rudi Trevisani

Email: privacy@uk.moovelub.com

Postal Address: 30 Tower View, Kings Hill, West Malling, Kent ME19 4UY

2. INFORMATION WE COLLECT FROM 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 follows:

“**Identity Data**” includes first name, last name, username or similar identifier, marital status, title, date of birth, gender and in some instances, passport details and photograph.

“**Contact Data**” includes billing address, delivery address, email address and telephone numbers.

“**Financial Data**” includes bank account and payment card details.

“**Marketing and Communications Data**” includes your preferences in receiving marketing from us and our third parties and your communication preferences.

“**Profile Data**” includes your username and password, membership details in relation to our membership programmes, purchases or orders made by you, your interests, preferences, feedback and survey responses.

“**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.

“Transaction Data” includes details about payments to and from you and other details of products you have purchased from us.

“Usage Data” includes information about how you use our website (including our membership programmes) and products.

We also collect, store, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data 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. 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 products). 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, 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:

- purchase our products;
- participate in industry events and/or hospitality;
- create an account on our website;
- subscribe to our service, publications or membership programmes;
- request marketing to be sent to you;
- enter a competition or promotion;
- participate in our surveys; or
- give us some feedback.

Please note that we may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

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. We may also receive Technical Data about you if you visit other websites employing our cookies.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
- (a) analytics providers (such as Google based outside the EU);
- Identity and Contact Data from professional networks or data brokers or aggregators such as LinkedIn based inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

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 or to take steps at your request before entering into such a contract.
- Where it is necessary for our legitimate interests (or those of a third party) in conducting and managing our business to enable us to give the best service 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).
- Where we need to comply with a legal or regulatory obligation and processing your personal data is necessary for compliance with a legal or regulatory obligation that we are subject to.
- Where we have obtained your consent to use your personal data.

5. 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 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or as a member to our loyalty and reward scheme	(a) Identity (b) Contact	Performance of a contract with you.
To process and deliver our products including:	(a) Identity	(a) Performance of any contract we enter into with you or for the taking of steps at

<p>(a) manage payments, fees and charges;</p> <p>(b) collect and recover money owed to us.</p>	<p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>your request with a view to entering into a contract.</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us).</p>
<p>To manage our relationship with you which will include:</p> <p>(a) notifying you about changes to our terms or privacy policy;</p> <p>(b) asking you to leave a review or take a survey;</p> <p>(c) contacting individuals at our customers/supplier for account administration, support and relationship management purposes; and</p> <p>(d) responding to enquiries.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of any contract we enter into with you or for the taking of steps at your request with a view to entering into a contract.</p> <p>(b) Necessary to comply with a legal obligation.</p> <p>(c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products and website, for training purposes and to improve the quality of our customer service).</p>
<p>To enable you to partake in our loyalty and reward scheme, surveys or competitions</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of any contract we enter into with you or our customer or for the taking of steps at your or our customer's request with a view to entering into a contract.</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products, loyalty and reward scheme and website, to develop them and grow our business).</p> <p>(c) We have obtained your consent to use your personal data.</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(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 reorganisation or group restructuring exercise).</p> <p>(b) Necessary to comply with a legal obligation.</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p>	<p>Necessary for our legitimate interests (to study how customers use our products, loyalty and reward scheme and website, to develop them, to grow our business and to inform our marketing strategy).</p>

	(e) Marketing and Communications (f) Technical	
To use data analytics to improve our website, products, marketing, loyalty and reward scheme, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products, loyalty and reward scheme, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products / services and grow our business).

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. For PPP (our loyalty and reward scheme), we have established a privacy centre where you can view and make certain decisions about your personal data use <https://www.commaoil.com/ppp/account>. For all other data enquiries please contact us via MARKETING@uk.moovelub.com.

We may use your Identity, Contact, Technical, Usage and 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 and 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 purchased products from us 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 outside the Moove Lubricants group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at MARKETING@uk.moovelub.com.

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, membership programme, product 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 see 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 at privacy@uk.moovelub.com.

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.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above.

External third parties

You agree that we have the right to share your personal information with the recipients referred to below for the purposes set out in the table in paragraph 5 above (under the heading 'Purposes for which we will use your personal data').

Recipient	Category of data	Purpose
Banks and payment providers services	(a) Identity (b) Contact (c) Financial	Processing of payments in the performance of our contract with you
Business partners, suppliers or sub-contractors such as [Logistic and Marketing companies.	(a) Identity (b) Financial (c) Profile (d)Marketing Communications &	Performance of any contract we enter into with you or our customer or for the taking of steps at your or our customer's request with a view to entering into a contract
Credit reference agencies	(a) Identity (b) Contact (c) Technical	Assessing your credit score which may be a condition of us entering into a contract with you, for fraud prevention and/or to pursue debtors which is necessary for our legitimate interests
Analytics and search engine	Aggregate anonymised	Improvement and optimisation of

providers	information about users of our products and website	our business which is necessary: (a) 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 and study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy); (b) to comply with a legal obligation.
Professional advisers such as insurers, accountants, lawyers, business advisers, pension advisers and financial advisors	(a) Identity (b) Contact	Supporting Moove Lubricants investigations which is necessary for: (a) any contract we enter into with you or for the taking of steps at your request with a view to entering into a contract; (b) to comply with a legal obligation; (c) our legitimate interests (for running our business, provision of administration and IT services).
Software development companies, cloud and infrastructure companies and web designers	(a) Identity (b) Contact (c) Financial (d) Profile Data (e) Technical (f) Usage	Our legitimate interests (for running our business, provision of administration and IT services).

Where it is necessary for us to share your personal information:

- 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; and
- we shall enter or (as the case may be) will enter into a written agreement with the third-party recipient which is consistent with this policy and satisfies the requirements of the applicable data protection legislation.

We will also disclose your personal information to 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; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request e.g. HM Revenue & Customs.

Internal third parties

We may also share your personal data with other companies in the Moove Lubricants group which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. This is necessary for our legitimate interests for running our business, to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy.

7. INTERNATIONAL TRANSFERS

We store your personal data within the Moove Lubricants Group. This will involve transferring your data outside of the European Economic Area (“EEA”).

Many of our external third parties are also based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, 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 by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see *European Commission: EU-US Privacy Shield*.

Please contact us at privacy@uk.moovelub.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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 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.

Where we have to keep basic information about our customers by law (including Contact, Identity, Financial and Transaction Data), we shall retain such personal data for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

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

- **Request access** to your personal data (commonly known as a "data 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. 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) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **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. 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.

If you wish to exercise any of the rights set out above, please contact us at privacy@uk.moovelub.com.

Right to lodge a complaint with a supervisory authority

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority 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.

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 may 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 may 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. LINKS TO OTHER WEBSITES

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which our products are advertised). If you follow a link to any of these websites, please note that these websites and any services that

may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

12. OUR POLICY TOWARDS CHILDREN

Our products and website are not directed to children. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, please contact us. If we become aware that a child has registered for a product or service and has provided us with personal data, we will delete such information from our files.

13. CHANGES TO PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

Any changes we may make to our privacy policy in the future will be posted on this page. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the applicable service. This privacy policy was last updated on 25th May 2018.

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.