

## Ford Pro Privacy Policy

This Privacy Policy will help you understand what personal information Ford Motor Company Limited and Ford Smart Mobility (UK) Limited (together “Ford”, “we”, “us”) collect as part of the business activity of Ford Pro, why we collect this information and what we do with it.

Ford Motor Company Limited and Ford Smart Mobility (UK) Limited are joint controllers of your personal information. Please see section 7 of this Policy for contact details of the designated point of contact. We have put in place an arrangement to govern our responsibilities as joint controllers and the essence of that arrangement is set out in this Privacy Policy.

In addition to this Policy, some Ford products and services have their own privacy policies which describe in more detail how your personal information is used in a particular context.

**Where the information outlined below is the personal data of a driver, you, or the person responsible for managing the fleet, may be responsible for compliance with data protection laws. For example, you should make those drivers aware of the contents of this Privacy Policy and may need to obtain any consents, where necessary. This Privacy Policy may help with those compliance obligations**

The first section of this Policy explains how we use data from connected vehicles, if you, or the person responsible for managing your fleet, have consented. The second section explains uses of other information

### Section 1 - Use of Connected Vehicle Data

If you, or the person responsible for managing your fleet, has consented, we may use connected vehicle data from your fleet for the purposes specified.

The data may include:

Category of Connected Vehicle Information	Examples of data
Vehicle Information	Vehicle Identification Number (VIN), hardware model and part numbers, status of vehicle systems (e.g., fluid levels, tire pressure, and locks), odometer, and other information about how your vehicle is performing
Driving Characteristics and Behaviour	Speed, use of accelerator, brakes, steering, seat belts, and other similar information about how the vehicle is used
Location Information	Latitude and longitude of your vehicle collected in real time. This information can be used to determine your device or vehicle's current location, travel direction, and speed.

Subject to your consent preferences, the purposes may include:

Purpose	Legal Basis
To undertake Research and Development to improve our future vehicles and services	Consent

<b>To develop Custom Recommendations</b> on topics such as maintenance checks, service plans, parts and accessories and charging stations.	<b>Consent</b>  The sending of marketing communications will be subject to your separate applicable marketing preferences.
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## Section 2 – Use of other information

### Information We Collect

In the course of Ford's business relationship with you or your business, you may give us information about yourself, for example, when you use or engage with Ford Pro services. You may also provide information when you make a request or respond to an offer from us. The information you give may include:

- Your business contact details (e.g. your name, business name and address, telephone number(s) and email address);
- information about your role at your organisation and your work, including but not limited to such as type and number of fleet vehicles managed, and their vehicle identification numbers (VINs) and rental/lease details;
- records of our interactions with you, including the products and services in which you are interested or have purchased;
- your feedback in response to any survey we send you;
- your delivery preferences;
- your social media username, if you interact with us through those channels
- your contact and marketing preferences and click through rates on marketing email campaigns, if applicable
- details on your visits to our websites, apps and social media content

### How your personal information will be used and the legal basis for processing

We use the personal information we collect about you and your fleet in accordance with data protection laws, for the purposes and on the legal grounds described below: information to assist with the purposes

Purpose	Legal Basis (subject to region)
<b>Provide Features and Services:</b> To allow you to benefit from any contracted services and to fulfil your requests in that context. In order to be able to perform the services, we may need to obtain some personal data from you.	Performance of a Contract
<b>Customer Support:</b> To provide support and answer questions about contracted services; or  general enquiries/pre-contractual enquiries	Performance of a Contract  Legitimate Interest
<b>Manage and improve our business and relationship with you</b>	Legitimate Interest
<b>Surveys and feedback to enhance product quality and development:</b> To verify that a service meets its intended purpose and to research and develop new products and services.	Legitimate Interest or Consent where required under local market regulations
<b>Assess and improve the quality of the services provided to you</b> by us, our dealers and our suppliers. We use this information to understand and enhance the customer experience. Cookies may also be used for this purpose.	Legitimate Interest or Consent where required under local regulations

<b>Develop and apply marketing strategies</b> , through various media, including our website (with or without the use of cookies)	Legitimate Interest or Consent where required under local regulations
<b>Send you marketing material in line with your communications preferences.</b>	Legitimate Interest or Consent where required under local regulations
<b>Make recommendations to you and personalize your experience/ communications, products and services</b> (see below)	Legitimate Interest or Consent where required under local regulations
Comply with our <b>legal and regulatory responsibilities</b> , to respond to legal process or requests for information issued by government authorities or other third parties	Legal obligation
<b>Prevent and detect crime and fraud</b> , or protect your, our or others' rights	Legitimate Interest

We would like to make sure the communications we send you and our interactions with you are as relevant to you as possible. As a result, we may use automated decision-making processes to analyse your personal information to assist the purposes above. From time to time, we may also combine data about you (for example name and contact details) collected from public sources and from third parties such as data brokers to help us determine what Ford products and services you might be interested in. Where we obtain information from third parties, we have taken steps to ensure that the third party is lawfully entitled to share your information with us for the processing purposes contemplated by us.

We may also work with third parties to show you tailored advertising on social media platforms that use advertising or, if you have consented to the use of advertising cookies, when you browse the internet/visit other websites.

We explain how you can update your marketing preferences in the 'Your rights' section below

### How We Share Information

We may share personal information with our internal teams involved in the sales, administration and support of Ford Pro, our affiliates ('our affiliates' means the group of companies related to us by common control or ownership in a group) and external service providers, who are subject to agreements that oblige them to only use the personal information as we instruct and to keep it securely.

We may also share personal information to comply with a legal obligation or requests from public authorities; to protect or defend our or another's rights or property; to protect individuals' personal safety; or to detect, prevent, or otherwise address fraud, security, safety, or privacy issues.

### Where Information is Stored

The IT systems on which we store your information may be located outside the UK, the European Economic Area and Switzerland (such as USA). If this is the case, we will ensure that appropriate safeguards are in place, where required, to protect the personal information and to ensure it is kept securely. These safeguards may include obtaining contractual assurances from any third party given access to your personal information that your personal information will be protected by standards which are equivalent to those that protect your personal information when it is in the EEA. For more information on how Ford protects your personal data when it is transferred to countries outside the EEA, or the safeguards provided by Ford to protect your personal data in the event of its transfer, please contact us.

### Your Rights

You have the right to find out what information we hold about you and for what purposes, as well as to make corrections if necessary. You also have the right in some circumstances to object to our continuing to process your personal data, or to ask us to delete, restrict the use of, or port your information to another service provider.

Where you have given your consent to our use of your personal data, you can withdraw your consent at

any time using the Contact Details in section 7 below.

If you are unhappy about how we handle your information, we hope that in the first instance you will contact us so that we are able to address your concerns. However, you are also entitled to lodge a complaint with your local data protection authority.

If you have questions or concerns regarding our processing of your information, or would like to exercise any of your rights, in the first instance please contact us using the contact details set out in section 7.

You can also contact the group Data Protection DPO at [dpeurope@ford.com](mailto:dpeurope@ford.com)

### **How long do we keep your information**

We only keep your personal information in identifiable form for as long as is necessary for the purposes set out in this Policy. This generally means holding the information for as long as one of the following apply:

- your personal information is reasonably required in order to provide the services to you or your company;
- your personal information is reasonably required in order to satisfy the purpose for which you submitted or we collected the information;
- your personal information is reasonably required in order to protect and defend our rights or property (this will generally be the length of the relevant limitation period in your jurisdiction); or
- we are otherwise required to keep your personal information by applicable laws or regulations.

We use appropriate systems, policies and procedures and technology to protect and maintain the security and accuracy of your information

### **Contact Details**

Here you will find the contact details for the point of contact:

Privacy Enquiry PO Box 616 Hull HU9 9PR

Email: [DPeurope@ford.com](mailto:DPeurope@ford.com)

### **Other websites and social networking**

If you access other websites using any links provided, the operators of those websites may collect information from you which will be used by them in accordance with their privacy policies, which may differ from ours.

You may also have the ability to share or follow information about Ford Pro, Ford Pro websites or the products and/or services available through it by means of a functionality (e.g. using "share this", "like" or "follow" buttons). We provide this functionality to stimulate interest in our sites and Ford Pro and to allow you to share and follow opinions, news and recommendations with your contacts. However, you should be aware that when you share personal information on a social network, that information may be collected and made publicly available by the social network provider, including through Internet search engines. The operators of the social networks process personal data as a data controller in accordance with their own privacy policy. You should always carefully read the privacy policy of any website or social network you visit or use to share information to understand their privacy practices.

The links may be updated from time to time by the operators. We make every effort to keep the links up to date, but you can also find the privacy policy directly through the operator.

Facebook: <https://www.facebook.com/about/privacy>

Instagram: <https://help.instagram.com/519522125107875>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

Twitter: <https://twitter.com/en/privacy>

YouTube: <https://policies.google.com/privacy>

Pinterest: <https://policy.pinterest.com/en-gb/privacy-policy>

### **Meta products**

When you use Meta products, for example on our websites or our Facebook pages, Meta collects information using cookies. This information relates to how people use the Meta products, such as the types of content that they view or engage with, or the actions they take as well as information about the devices they use (such as IP addresses).

Meta also collects and uses information to provide analytics services called Page Insights to us. These insights are created based on specific information about individuals who have visited our website and social media presences which includes personal data collected through cookies. Meta then provides us with aggregated statistics and insights for our social media activity on their products and pages, which helps us understand how people interact with our pages and the content associated with them.

There is a joint responsibility between Meta and us regarding the collection and transfer of your data to Facebook Ireland (now Meta) which is subject to the joint controller agreement below. Analysing the anonymised insights data serves our legitimate interest to optimise the range of services on our website and social media presences and to evaluate the types of actions being taken on our website and social media presences and to improve based on these findings.

Meta is solely responsible under the General Data Protection Regulation (GDPR) for the subsequent data processing after transmission, including information obligations, data subject rights and data security. We have entered into a joint controller agreement with Facebook Ireland (now Meta) which determines the respective responsibilities for compliance with the requirements of the GDPR insofar as Meta and us are joint controllers in accordance with GDPR the corresponding agreement shall apply:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

You can find information on the processing of your personal data by Meta

at <https://www.facebook.com/about/privacy>. There you will also find further information about the legal basis of data processing by Meta and how you can assert your rights as a data subject against Meta. The information in this privacy policy applies to data processing by us.

### **Google reCAPTCHA tool**

Where is directed to use the Google reCAPTCHA tool so that an integrity check can be performed to ensure a bot is not using certain site functionality.

Google collects hardware and software information, such as device and application data, in order to perform the integrity checks. Google is independently owned and operated, and data collected by Google is subject to its privacy policy. We encourage you to review the Google privacy policy at <http://www.google.com/privacy.html> and Google's How Google uses data when you use our partners' sites or apps (located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)) so that you can understand how the data is collected, used and shared.

This Privacy Policy may be updated in order to reflect any changes to our privacy practices and use of your information, or applicable law.

**Last Updated. 23 April 2024**

