



CUSTOMER PRIVACY POLICY

Introduction

This privacy policy sets out how **London EV Company Limited (LEVC)** uses and protects your personal data. This policy applies to all your interactions with LEVC including for example when you purchase a product or service, when you use our websites, when you register with us, sign up to our newsletter, 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 can download a copy of the policy here: <https://www.levc.com/site/privacy-policy/>.

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

1. Important information and who we are

This privacy policy gives you information about how LEVC collects and uses your personal data through all of your interactions with us including for example when you purchase a product or service, when you use our websites, when you register with us, sign up to our newsletter, 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).

Regarding our websites, they are not intended for children, and we do not knowingly collect data relating to children. 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.

We do not, via the website, collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We do not generally collect information about criminal convictions and offences however, where necessary to arrange the provision of a courtesy, replacement, or loan vehicle, we may process limited information relating to driving offences, driving licence endorsements or penalty points, with your knowledge and agreement as part of the relevant vehicle loan or hire agreement, for the purpose of assessing driver eligibility, insurance compliance and vehicle safety.



Controller

LEVC is the controller and is responsible for your personal data (referred to as “LEVC”, “we”, “us” or “our” in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9), please contact us using the information set out in the contact details section (paragraph 10).

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.

Depending on your engagement with LEVC, 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, employer, business name, date of birth, image, driving licence information, and username.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Health Data** includes special category information relating to your vulnerabilities or disabilities.
- **Criminal Offence Data** including information relating to driving convictions, driving licence endorsements, disqualifications or penalty points, where required to assess eligibility to drive a courtesy, replacement or loan vehicle.
- **Financial Data** includes credit history, bank account and payment card details.
- **Interaction Data** includes contractual documentation such as terms including finance and insurance arrangements, 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.
- **Vehicle Data** includes the Vehicle Identification Number (VIN), Vehicle Registration Number, technical information, warranty claims and related information, repair and maintenance history.
- **Technical Data** includes 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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, survey responses, messages, comments and questions.
- **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 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, or by visiting our premises. This includes but is not limited to personal data you provide when you:
 - visit our website;
 - visit our premises;
 - complete an online contact form;
 - purchase our products or services;
 - enquire about and enter financing arrangements;
 - agree to the servicing of, or repairs, to your vehicle;
 - subscribe to our services or publications;
 - agree to marketing being sent to you;
 - request or are provided with a courtesy or replacement vehicle including where this is arranged for you by us through a third party provider;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **CCTV cameras.** For security reasons and to preserve the safety of people, property and facilities, we may process your image through our video surveillance cameras on our sites based on this legitimate interest. All recordings will be kept for a maximum of 45 days unless necessary to comply with legal obligations.
- **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. We may also receive Technical Data about you if you visit other websites employing our cookies including but not limited to www.levc.com and www.levcbreweryroad.com. Please see our cookie policy [<https://www.levc.com/site/cookies-policy/>] for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Driver Vehicle Licensing Authority



- Driver and Vehicle Standards Agency
- Google reviews which link to our website
- Insurance companies (with your explicit consent)
- **Technical Data** is collected from the following parties:
 - analytics providers such as Google based outside the UK;
 - advertising networks such as Google Ads, Google Conversion Tracking, LinkedIn Insight Tag and Meta which are based outside the UK; and
 - search information providers such as Google Search Console (GSC) based outside the UK.
- **Identity and Contact Data** is collected from publicly available sources such as Companies House, Care Quality Commission, 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 or have entered with you.
- **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 or regulatory obligation that we are subject to. We will identify the relevant legal or regulatory 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 receive marketing or if you consent to us contacting your insurance company.

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
<p>To communicate with you following your completion of an online 'contact form'</p>	<p>(a) Identity (b) Contact (c) Marketing and Communications</p>	<p>Necessary for our legitimate interests (such as a response to your enquiry).</p> <p>Where your enquiry is directed to one of our third-party dealers from the LEVC dealer network, LEVC will be required to share the data provided on the enquiry form with that third party. Data shall be shared with the selected dealer only, and you should consult the selected dealer for details of their privacy policy.</p> <p>Note: the LEVC Brewery Road dealer is owned by LEVC and is not part of the third-party dealer network, therefore this privacy notice applies to their use of your data.</p>
<p>To register you as a new customer</p>	<p>(a) Identity (b) Contact (c) Profile (d) Health</p>	<p>(a) Consent (b) Necessary for our legitimate interests (such as our response to your enquiry) (c) Health data is processed where necessary for the performance of our obligations under law relating to social protection</p>
<p>To process and deliver your order including:</p> <p>(a) Managing payments, fees, charges, and finance arrangements (b) Collect and recover money owed to us (c) Managing your order</p>	<p>(a) Identity (b) Contact (c) Health (d) Financial (e) Interaction (f) Transaction (g) Marketing and Communications (h) Vehicle</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (such as the recovery of debts due to us) (c) Health data is processed where necessary to ensure fair and equal treatment</p>
<p>To manage our relationship with you, including the facilitation of finance arrangements, which will include:</p> <p>(a) Handling your enquiries</p>	<p>(a) Identity (b) Contact (c) Profile (d) Health (e) Financial</p>	<p>(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)</p>

<p>(b) Notifying you about changes to our terms or privacy policy</p> <p>(c) Dealing with your requests, orders, complaints and queries.</p> <p>(d) Asking you to leave a review or take a survey. This may include customer satisfaction or market research surveys hosted using third-party survey platforms.</p>	<p>(f) Marketing and Communications</p>	<p>(d) Health data is processed where necessary to ensure equality of opportunity and treatment.</p>
<p>To arrange and provide courtesy, replacement or loan vehicles, including insurance verification or insurance arrangement, vehicle delivery and collection, and fleet management.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Criminal Offence Data</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary for our legitimate interests (including ensuring the safe and lawful use of vehicles and meeting insurers requirements)</p> <p>Note: criminal offence data is processed in accordance with Schedule 1, Part 2, paragraph 18 of the Data Protection Act 2018, and only where strictly necessary and proportionate.</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</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) Consent</p> <p>(b) Performance of a contract</p> <p>(c) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and our websites (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) Consent</p> <p>(b) 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>(c) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and online advertisements to you and</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Consent</p> <p>(b) Necessary for our legitimate interests (to study how customers use our</p>

measure or understand the effectiveness of the advertising we serve to you	(c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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	(a) Consent (b) 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	(a) Consent
To carry out market research through your voluntary participation in surveys. This may include customer satisfaction or market research surveys hosted using third-party survey platforms.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Consent (b) 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 carry out incident investigation and management	(a) Identity (b) Contact (c) Transaction (d) Vehicle	(a) Necessary for our legitimate interests (for running our business, to keep our records of such incidents updated to ensure efficient resolution and management of incidents) (b) Necessary to comply with a legal obligation
To provide aftersales services to you particularly in relation to the diagnosis, analysis, maintenance, repair, and servicing of your vehicle(s).	(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)



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Direct marketing

When you complete the contact form on our website when personal data is collected, you will be asked if you agree to receiving marketing communications from us and where you agree to receiving marketing you are asked to indicate your communication preferences e.g. via email, SMS, or phone. You will also 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 product, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us [<https://www.levc.com/data-preferences/update-marketing-preferences-request/>].

If you 'opt out' of receiving marketing communications and are a customer, you will still receive goods or 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, update to this privacy notice, and checking that your contact details are correct.

Cookies

When you visit our website, you are asked whether you consent to 'Targeted advertising cookies'. If these cookies are enabled, we will deliver advertising to you that is relevant to you and your interests.

For more information about the cookies, we use and how to change your cookie preferences, please see <https://www.levc.com/site/cookies-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.

- LEVC dealers and authorised repairers (details of which can be found at www.levc.com).
- External Third Parties listed in the Schedule to this policy



- Insurance providers where required in connection with the provision of a courtesy, replacement or loan vehicle. This may include the sharing of limited information relating to your driving licence details, driving convictions, licence endorsements or penalty points, solely for the purposes of assessing driver eligibility, arranging insurance cover and managing risk.
- Any law enforcement agency, court, regulator, government agency or other third party where we believe it is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights, your rights, the rights of any third party or individual's personal safety, or to detect, prevent, or otherwise address fraud, security or safety issues.
- 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. International transfers

We may share your data with our LEVC colleagues in Europe for example, if you have requested contact from our dealerships within the EU or acquired goods or services in the EU. We shall only share your data to the extent necessary, if required by law, or where you have given consent. We ensure that there is an adequate level of data protection in place before transferring any personal data.

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 transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data, namely, Europe; or
- We 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 via the Contact details (paragraph 10).

7. 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.

Information relating to driving convictions and licence endorsements is accessed only where necessary, is limited to what is relevant to the specific purpose, and is subject to appropriate access controls and confidentiality safeguards.

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.

8. 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.

If you enter a contract with us, we will keep your information for seven years from the end of the contract. In all other circumstances we shall retain your data for as long as is necessary in the circumstances or until you ask us to delete your data (see paragraph 9 for further information).

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will 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.

9. Your legal rights

You have several 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. 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 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 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 via the Contact details (paragraph 10).

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 several requests. In this case, we will notify you and keep you updated.

10. Contact details

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

- Email address: gdpr@levc.com
- Postal address: LEVC Head Office, Li Close, Ansty Park, Ansty, Coventry, CV7 9RF
- Telephone number: 02476 572000

11. 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 using the Complaints Form [<https://www.levc.com/site/privacy-complaints-form/>] which can be found on our website or by using the



contact details as set out above. We shall acknowledge your complaint within 30 days of receipt, and, without undue delay, we shall take appropriate steps to respond to your complaint and inform you of the outcome.

12. 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 24 April 2026.

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.

13. 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.



SCHEDULE: EXTERNAL THIRD PARTIES

- Keyloop (UK) Limited
- Salesforce UK Limited
- Kerridge Commercial Systems or Pinewood Technologies PLC – dealer management system
- Finance providers: Volvo Car Financial Services UK Limited and Close Brothers Group Plc
- Driver and Vehicle Licensing Agency
- Driver and Vehicle Standards Agency
- Global Payments Inc. - payment card machine provider
- LEVC dealers and authorised repairer listed on our website at www.levc.com.
- The third parties set out in the cookie policy that can be found at <https://www.levc.com/site/cookies-policy/>.
- TWG Services Limited – extended warranty provider
- Innovation 24 Limited – software platform which supports the management and administration of courtesy, replacement or loan vehicles.
- Insurance companies – the sharing of information with your insurance company will be with your explicit consent
- Providers of online customer survey and feedback tools such as Google