

Source London personal data and cookies management policy

01 of January, 2021 version

1. Preamble

Source London Mobility Solutions Ltd (Company number: 08803842) is committed to protecting and respecting the User privacy. "Source London" is a trading name of Source London Mobility Solutions Limited.

This policy, together with the Website Terms of Use, sets out the basis on which Source London will process any personal data Source London collects from a user or a user provides ("User") to Source London through the use of the Source London Scheme (the "Service" or "Source London service"), the Source London app ("App") and/or Source London website (<https://www.SourceLondon.net/>) ("Website").

Please read this policy carefully to understand Source London views and practices regarding the User personal data and how Source London will treat it.

For the purpose of the Data Protection Act 1998 ("DPA"), the data controller is Source London Mobility Solutions Ltd whose data protection registration number is ZA052445.

2. Lawfulness of processing

The processing of Users personal data has the following legal basis:

- The acceptance of the Terms and Conditions for the use of the Source London service, that constitutes a contract;
- The consent of Users when required by the regulations in force, particularly in terms of commercial prospecting and cookies;
- The legitimate interest of Source London in ensuring and improving the quality and security of its services, the Website and App;
- The legitimate interest of Source London in carrying out optional satisfaction surveys on its services in order to improve them;
- Source London compliance with legal and regulatory obligations to the authorities

3. Personal data processed when providing the Source London service to Users

Source London may Hold the User Information in two ways: The User give Source London information or Source London collect information about the User.

Source London may collect and process the following information about the User:

3.1. Information the User give Source London

The User may give Source London information:

- by filling in forms on Source London Website or App. For instance, if the User sign up as a member of the Source London Scheme, the User will share its personal information with Source London, including the User name, e-mail address, payment card details or other payment details (which the User must provide in order to sign up as a member), vehicle registration number, the User company name (if applicable), telephone numbers, address and any other details the User may provide on the User membership application form;
- if the User contact or correspond with Source London, (for example, by email, phone), through Source London App, by text message or otherwise) and Source London may keep a record of that correspondence (either directly or through Source London service providers).

Source London do not seek to collect sensitive personal information from the User

3.2. Information Source London collect about the User

1. information collected automatically:

Each time the User use the Source London service, Source London Website or App Source London may automatically collect the following information:

- when the User use a charge point, Source London will keep a record of the details of that usage, including the date, time, location and duration of the usage and any other details of the services Source London may provide to the User.
- any parking contraventions that the User carry out when using the Source London service;
- any comments, opinions and feedback the User provide to Source London regarding the Source London Scheme and the User use of Source London services;
- technical information about the User computer or mobile device for system administration and analysis, including the User IP address, unique device identifiers, operating system, wireless network interface, device telephone number and network and browser type;
- details of the User use of the App including, but not limited to, traffic data, location data, the User frequency or duration of use; and
- information about the User visit to Source London website and browsing activity, including the full URL information, products the User viewed and length of visits to certain pages. This is statistical data about Source London users' browsing actions and patterns, and does not identify any individual.
- customer service call records, are used by Source London to manage its relationship with subscribers and users, to provide and improve the quality of the Source London service (including subscription, assistance, back-up, customisation of services, Source London's call centre agent training, claims management, etc.) and to handle claims and litigation files.

2. App permissions:

In order to use some of the functions provided by the App, it may request access the following features of the User mobile phone:

- Access to photos, content, multimedia, files, to allow the App to scan the User subscriber and user documents (driver's licence, passport...) and / or select them from the User mobile phone's memory for the strict purpose of the use of the Service.

- Access to the list of contacts registered on the User mobile phone to allow the App to retrieve the address of a contact in the list in order to locate it on the Service map, or to pre-fill the registration form to subscribe to the Service.

3. App location:

In order to use some of the functions provided by the App (such as locating a charge point) Source London use an application program interface which uses GPS, Wifi and mobile network information technology to determine the User current location when using the App. When the User first open the App, Source London will ask the User for the User consent to use the User location data for this purpose. When the User are not using the App Source London do not collect location data. The User can withdraw the User consent at any time by changing the User location data settings in the App or on the User mobile device, but this will affect the User ability to use the Service.

3.2.4. Information Source London receive from others:

Source London work closely with third parties (including for example, business partners, other companies within Source London group, subcontractors in technical and payment services, analytics providers, search information providers, fraud prevention agencies) and may receive information about the User from them.

Source London may also collect details relating to the User vehicle from third parties, such as the DVLA, in order to check that the registered keeper details the User have provided are correct.

4. Purposes of the processing

Source London may use the information Source London hold about the User for the following purposes of the processing and in the following ways:

1. Information the User give to Source London

Source London will use this information to:

- process the User application to become a member of the Source London Scheme;
- carry out Source London obligations arising from any contracts entered into between the User and Source London and to provide the User with information, products and services the User request from Source London;
- facilitate the User ability to reserve and use charge points under the Source London Scheme;
- process payment of membership and other fees;
- send the User Source London periodic newsletters and information about the Source London Scheme via email, text message or other electronic means (although the User have the ability to opt out of receiving these types of communications by contacting Source London using the details provided below or clicking the relevant link in the communication itself);
- email or text message the User for the User feedback on Source London services and to help

Source London evaluate and improve Source London services, for example by acting on any information the User have provided to Source London;

- notify the User about changes to Source London Website, App and/or services;
- deal with any enquiries, correspondence, concerns or complaints the User have raised; or
- deal with any enquiries, correspondence, concerns or complaints from third parties involving the User and any issues caused by the User use of the Source London service (for example where the User have improperly parked while using the Source London service).

2. Information Source London collect about the User

Source London will use this information:

- to administer and improve Source London Website and App;
- for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- as part of Source London efforts to keep Source London Website and App safe and secure;
- to make suggestions and recommendations to the User and other users of Source London Website and App about products or services that may interest the User or them; or
- to compile reports (which do not personally identify the User) of usage of the Source London service.

3. Information Source London receive from other sources

Source London may combine this information with the information the User give to Source London or Source London collect about the User and use this information as specified above.

4. Vehicle number plates

Source London will use (and disclose to other business partners) the number plates of the vehicles of Source London corporate or fleet customers (such as car clubs or companies whose employees have (through their employer being a corporate Source London member) the ability to use the Source London Charge Points) in order to provide Source London service to these customers (for instance to facilitate access to a car park within which a charge point is located).

Source London do not collect personally identifying information relating to drivers of the vehicles of Source London corporate and fleet customers, but Source London do monitor the usage of Source London charge points and service by the vehicles of these customers.

5. Source London Badge

Where Source London issue the User with a Source London membership card to facilitate the User use of the service as a Source London member, this card is printed with the User name and membership number, and should be kept safe. Please see the 'Security of Information' section below.

5. Recipients or categories of recipients and transfer of personal data

1. Source London internal recipients or categories of recipients

Personal data processed by Source London are processed internally by the relevant departments of Source London, in particular by the marketing, financial, IT departments and the Customer Relations Center.

2. Disclosure of the User information

Source London may share the User information with selected third parties in accordance with this policy, including:

- service providers, for example of IT services, or business partners, suppliers and/or sub-contractors, such as payment service providers, or insurance companies, collection companies, judicial officer or lawyers, for the performance of any contract Source London enter into with the User;
- government, parking enforcement authorities or other law enforcement agencies in connection with the investigation of unlawful activities, unauthorised parking by the User or for other legal reasons; and
- companies within Source London group and other service providers in order to provide the Source London services to the User and to verify the User identity (for example, when the User use the Source London service to reserve and/or use a charge point, Source London may need to share the User personal information, such as the User membership number, the User Source London pin number and the User vehicle registration number).

Source London may disclose the User personal information to third parties:

- if Source London sell or buy any business assets or receive investment into Source London business, Source London may disclose the User personal data to the prospective or actual buyer, seller or investee of such business or assets.
- if Source London are under a duty to disclose or share the User personal data in order to comply with any legal obligation, or in order to enforce or apply Source London Website Terms of Use or other contracts between Source London and the User; or to protect the rights property or safety of Source London, Source London customers or others.

Except as explained above, Source London will not disclose the User personal data to any third parties for any other purpose unless Source London have the User consent or Source London otherwise legally have the right or obligation to do so (for example, in an emergency).

3. Sensitive Personal Data

Source London do not actively collect sensitive personal data from the User, but the User may, during the User use of the Source London service, provide some personal data to Source London that may be classified as "sensitive" under the DPA. If the User disclose sensitive personal information to Source London, Source London will use that information for the purpose(s) the User provided this sensitive personal information to Source London.

Source London will only share the User sensitive personal data with other third parties without the User consent if Source London have a legal basis to do so.

4. International Data Transfers

The information that Source London collect from the User may be transferred to, processed and stored at, a destination outside the European Economic Area ("EEA"). By submitting the User information to Source London, the User agree to this transfer, processing and/or storing. Source London will take all steps reasonably necessary to ensure that the User personal data is treated securely and in accordance with this privacy policy.

6. Data retention period

Source London will retain the personal information Source London receive and collect about the User for period which is reasonably required for Source London to use it in accordance with the periods indicated in this article or in accordance with Source London legal rights and obligations.

1. Data retention period except for litigation or judicial requisition

1. General

Except for litigation or judicial requisition (with restricted access to the services concerned) and before archiving for compliance with legal and regulatory obligations of Source London, in particular for the duration of the prescription of actions that may arise from the use of the Source London service, most of the personal data collected are kept on an operational basis until 3 years after the end of subscriptions.

Data relating to simple prospects are kept for 1 year from the last contact, without subsequent archiving.

2. Exceptions

By exception, but still except for litigation or judicial requisition (with restricted access to the services concerned):1. Personal data and usage data:

- Gender, surname and first name: used for billing (billing after each use of service) and for potential legal purposes;
- Birthdate: used for identification and for potential legal purposes;
- Address and country: used to send the badge of the service after the subscription, for billing (billing after each use of service) and for potential legal purposes;
- Email: used to contact clients, for billing (billing after each use of service) and for marketing purposes;
- Phone number (landline and mobile number): used to contact clients;
- Preferred language, used for customer support purposes
- Vehicle model and registration number; used for identification and for customer support purposes
- Bank Account IBAN and BIC, for billing purposes (billing after each use of service);
- Communication (calls, SMS, website form, emails etc.), claims and litigation information: used for legal purposes;
- Key card ID (subscriber ID), used for service operation, provided by BPL.
- Geographic location of the car when they are charging: used for billing (prices are depending of the CP location) (billing after each use of service).
- Usage data (charges, reservations), used for business analyses, collected by BPL;

Retention period: Three (3) years except in case of litigation (stored until the end of the litigation). After the duration of 3 years, in case of litigation, BPL will only retain specific data that is relevant to that litigation and the access is restricted only to those who need this information for this purpose.

2. Activity logs:

- Clients activity logs into the charge point

Retention period: five (5) years.

The access is restricted only to those who need this information for this purpose.

3. Invoices:

- Invoices: billing after each use of service;

Retention period: six (6) years except in case of litigation (stored until the end of the litigation). After the duration of 6 years, in case of litigation, BPL will only retain specific data that is relevant to that litigation and the access is restricted only to those who need this information for this purpose.

4. Unpaid booklets:

Retention period: three (3) years after termination of the subscription except in case of litigation (stored until the end of the litigation). Access to this information is restricted only to those who need this information for this purpose.

5. Incident file:

Retention period: three (3) years after termination of the subscription except in case of litigation (stored until the end of the litigation). After the duration of 3 years, in case of litigation, BPL will only retain specific data that is relevant to that litigation and the access is restricted only to those who need this information for this purpose.

6. Recording of subscription-related calls and emergency calls:

90 days, without subsequent archiving.

2. Data retention period in the event of litigation or judicial requisition

In the event of litigation or judicial requisition, the retention periods are extended until the situation is cleared or the legal actions are prescribed, with restricted access only to Source London services that need to investigate and process the files concerned.

7. Rights of the User according to the GDPR

7.1. User rights list

The User have the following rights in regards to the User personal information:

Access. The User have the right to access information about the personal data

Source London hold about the User.

The User right of access can be exercised in accordance with the DPA.

Source London will require the User to prove the User identity before Source London release any personal information to the User (for example, by providing photographic identification).

In accordance with current European regulations (General Data Protection Regulation – GDPR), subscribers and users have the following rights:

- Right of **access** (article 15 GDPR) and rectification (article 16 R GDPR), updating, data completeness;
- Right to **erase data** (Article 17 GDPR) when they are inaccurate, incomplete, ambiguous, out of date, or whose collection, use, communication or storage is prohibited (learn more);
- Right to **withdraw consent** at any time (section 13(2)(c) GDPR);
- Right to **limit the processing of data** (Article 18 GDPR) (learn more);
- Right to **object to the processing of data** for legitimate reasons (Article 21 GDPR) (learn more);
- **Right to the portability of data** provided by subscribers and users, when such data have been subject to automated processing based on their consent or on a contract (Article 20 GDPR).

7.2. How to exercise these rights and data protection officer contact

If the User would like to exercise one of these rights, please contact Source London through the User personal account on the Source London Website. The User may email on dpo@source-london.co.uk or alternatively write to Source London at Source London FAO Data Controller Officer, 183 Eversholt Street, London, United Kingdom, NW1 1BU.

The User must indicate in the User request which personal data the User would like Source London to correct, update or delete. **All applications must be accompanied by a copy of the applicant's identity document (valid identity card or passport).**

Requests for deletion are however subject to the obligations imposed by law on Source London, in particular as regards the conservation or archiving of documents.

7.3. Complaints

If for any reason the User are not happy with the way that Source London have handled the User personal information the User have the right to make a complaint to the Information Commissioner's Office.

7.4. Marketing

As detailed above, the User have the ability to opt out of receiving marketing communications from Source London and the other companies within Source London group by contacting Source London using the details provided below or clicking the relevant link in the communication itself.

8. Cookies and token policy

8.1. How Source London Use Cookies and token

1. Source London use Cookies on its Website and on its App, that allow its Users to use the Source London Scheme.

As a reminder, the Cookies are small data files that Source London store on the User browser of the User computer or mobile device and that are applied by the majority of websites the User visit. Cookies contain information that is transferred to the hard drive of the User computer.

The Cookies are used by Source London in order to distinguish one specific User from other users. It helps Source London to provide the User with a good experience when the User browse Source London Website also allows Source London to improve Source London Website.

2. Source London use token on its App, that allow its Users to use the Source London Scheme.

Token are informations stored in the App, to allow its Users to keep connected during during his navigation in the App.

8.2. Category of cookies and token used by Source London

Source London use the following cookies on the Website:

- **Strictly necessary cookies.** These cookies are required for the operation of the Website and, and in particular its registration / login apparatus, operate effectively. These cookies are essential in order to enable the User to sign-in to the User account. These cookies do not remember where the User have been on the internet. These cookies cannot be disabled.
- **Functionality cookies.** These are used to recognise the User when the User return to Source London Website. This enables Source London to personalise **Source London content for the User, greet the User and remember the User preferences.**
- **Google Analytics cookies.** These cookies collect standard internet log information and details of visitor behaviour patterns to enable Source London to maintain and develop the Website. The data gathered is anonymous and does not identify individual users.
- **Advertising cookies.** These cookies are used by Source London and their marketing agency to measure the performance of their digital advertising campaigns.

Below is a list of the all the cookies Source London have set and Source London reasons for doing so:

Cookie	Use
tartaucitron	This cookie stores when the user closes the cookie banner. It memorizes the choices related to the user's consent on the use of cookies on the site.
Drupal.tableDrag.showWeight	Our Content Management System, Drupal sets these cookies to store user interface preferences.
has_js	Drupal uses this cookie to indicate whether or not the visitor's browser has JavaScript enabled.
__utma	Used by Google Analytics to distinguish users and sessions.
__utmz	Used by Google Analytics to track the source of website traffic or specific UTM campaigns.
OTZ	Used by Google Analytics that provides an aggregate analysis of Website visitors.
_gcl_au	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.
APISID, NID, Secure-APISID, SID, __Secure-3PSID, Secure-3PAPISID, SIDCC, 1P_JAR, ANID	Used by Google to display personalized advertisements on Google sites, based on recent searches and previous interactions.
SAPISID, SSID, Secure-SSID, HSID, __Secure-HSID -	Used to enable Google to collect user information for videos hosted by YouTube.
CONSENT	Used to detect if the visitor has accepted the marketing category in the cookie banner.
_ga	Used to keep a record of visitor statistics.
_fbp, fr, cppo	Used by Facebook to deliver, measure and improve the relevancy of their advertising and to deliver a series of advertisement products on Facebook.
presence	Facebook cookie. Contains a logged in user's "chat" status.
c_user	Facebook cookie. Contains the user ID of the currently logged in user.
spin, datr, wd, xs, act, sb	These cookies identify the browser connecting to Facebook. They are not directly tied to individual Facebook the user. These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign.
external_referer, guest_id	We use a Twitter widget to deliver live feeds of our latest Twitter posts on our site. These cookies enable us to link with twitter to authorise our use of the widget.
rweb_optin, csrf_same_site, csrf_same_site_set, dnt, kdt, ads_prefs, lang, personalization_id	These cookies are used for advertising and marketing purposes. We use these cookies to know that a visitor has been on our site before which allows us (or a third

	party) to display an appropriate advertisement on another website.
remember_checked_on	This cookie is generally provided by Twitter to monitor referral links and login status.
li_oatml	Used by LinkedIn to enable ad delivery or retargeting.
aam_uuid, UserMatchHistory	Used by LinkedIn to track visitors on several websites, to present relevant advertisements on the basis of the visitor's preferences.
liap, lissc	Used for Sign-in with LinkedIn and/or for LinkedIn follow feature
bcookie	Used by LinkedIn to track the use of embedded services.
lidc	Used for routing from LinkedIn Share buttons & advertising services
VID	Used by LinkedIn to capture information about users in order to better understand their ways of interacting with apps or websites.
ELOQUA	Eloqua employs cookies in order for its server to recognize a return visitor as a unique user. The cookies placed by the Eloqua server are readable only by Eloqua, and cookies cannot access, read or modify any other data on a computer. Cookies themselves do not contain any personal information.
SEARCH_SAMESITE	SameSite prevents the browser from sending the cookie along with cross-site requests. The main goal is mitigating the risk of cross-origin information leakage. It also provides some protection against cross-site request forgery attacks.
AMCV_*AdobeOrg	This cookie contains the Experience Cloud ID (MID) and a region ID for site visitors.
mbox	This cookie enables us to test what content is of most interest to visitors to the website.

Source London use the following token on the App:

Strictly necessary: Source London use token strictly necessary to allow its Users to keep connected during during his navigation in the App.

8.3. Cookie Consent and Managing Cookies

The User may control and block the cookies used by websites by modifying the settings in the User browser. However, if the User use the User browser or device settings to block all cookies (including essential cookies) the User may not be able to access all or parts of Source London Website.

To access the Google Analytics opt out browser, please visit <https://tools.google.com/dlpage/gaoptout>. By choosing this option, the User will block Google Analytics across all websites.

For more detailed information about cookies and how they can be managed and deleted please visit www.allaboutcookies.org.

9. Miscellaneous

9.1. Security of Information

Where Source London have given the User (or where the User have chosen) a password which enables the User to access certain parts of the Website and/or App, or a Source London membership card to access charge points, the User are responsible for keeping this password membership card confidential. The User must not share these with anyone, or store them in a way that may allow a third party to access them.

Unfortunately, the transmission of information via the internet is not completely secure. Although Source London will do Source London best to protect the User personal data, Source London cannot guarantee the security of the User data transmitted to the Website or App and the User acknowledge that any transmission is at the User own risk. Once Source London have received the User information, Source London will use strict procedures and security features which are appropriate to the type of personal data the User have provided to try to prevent unauthorised access or inadvertent disclosure.

9.2. Status of this Policy and The User Consent

For some of the uses of the User information described above there is a legal basis under the DPA for Source London to use the information without the User consent. This includes, for example, legitimate provision of information to service providers acting on Source London behalf. Where this is the case, this privacy policy fulfils Source London duty to process information fairly, which includes giving the User appropriate notice and explanation of the way in which the User information will be used.

Where consent is required for Source London use of the User information, by submitting the User information to Source London the User consent to Source London use of that information as set out in this policy; and if the User disclose someone else's information to Source London, the User confirm that the User have their consent to disclose this information to Source London and for Source London to use and disclose it in accordance with this policy.

If the User provide Source London with the User sensitive personal data the User expressly consent to Source London using that data and disclosing it to Source London service providers for the purpose given. If the User disclose someone else's sensitive personal data to Source London the User confirm that the User have their consent to disclose this information to Source London and for Source London to use and disclose it to the relevant service providers for the purpose given.

9.3. External Websites

The Website and App may, from time to time, contain links to external websites. If the User follow a link to any external websites, please note that these websites have their own privacy policies and website terms and Source London do not accept any responsibility or liability for these policies. Please check these policies before the User submit any information to any external websites.

9.4. Changes to this Privacy Policy

Any changes Source London may make to Source London privacy policy will be posted on this page and where appropriate will be notified to the User by email or text message. Continued use of the Website and/or App will signify that the User agree to any such changes.

9.5. Keeping Source London Updated / Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Source London Mobility Solutions Ltd, FAO Data Controller Officer, 183 Eversholt Street, London, United Kingdom, NW1 1BU.