

PRIVACY POLICY

This privacy policy (the “**Privacy Policy**”) explains how **Michaels Automotive LTD** as data controller “**Controller**”, “we,” “us,” or “our”) collect, use, and disclose Personal Data. Personal Data means any information that can itself identify you as an individual that can be connected to you indirectly by linking it to personally identifying Information. We also process anonymous data, aggregated or not, to analyze and produce statistics related to the habits, usage patterns to our customers. Such anonymous data does not allow the identification of the customers. We may also share such anonymous data with third parties.

IMPORTANT! This Privacy Policy is issued by an independently operated and owned service provider. Ford Motor Company affiliates or any of its subsidiaries are not involved in the data processing as a data controller or data processor. In case Ford Motor Company or any of its subsidiaries participate as a recipient in a processing operation, this information shall be indicated separately in this Privacy Policy.

If you would like to stop receiving communications from us or you wish to exercise your rights as a data subject as listed below please contact us via email at info@fordcyprus.com OR fordmarketing@fordcyprus.com.

1. THE SOURCES OF DATA WE PROCESS

We may collect and receive a variety of information from you, as described below. If you do not provide your Personal Data when requested, you may not be able to use our Services if that information is necessary to provide you with our Services or if we are legally required to collect it. We may only process your Personal Data for a retention period which is necessary to fulfil the purposes we collected it for, including to comply with any legal or reporting or audit requirements. Hence these needs can vary for different data types in the context of different products, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual obligations.

2. PURPOSE OF DATA PROCESSING

2.1 Apply for a test drive

Scope of processed personal data: Your name (first name and last name), your phone number and e-mail address. You may give your consent to marketing purposes as well as per 2.4 of this Privacy Policy.

Legal bases for data processing: Legitimate interest of the Controller pursuant to the GDPR Art. 6 (1), point f) for fulfilling your request regarding test drive opportunity.

Purpose of data processing: Processing related to the use of the service, such as providing option for the test drive or to get in touch with you to fix an appointment.

Term of data processing: The applicable period of processing is 3 months from the date of use of the service, if we have no other legal basis for processing your data (for example, if you do not enter into a contractual relationship with us).

Data transmission: We may transmit your data to a local service provider to fulfill your request.

2.2 Book a Service

Scope of processed personal data: Your name (first name and last name), your phone number and e-mail address, your vehicle details such as the year of production, the vehicle model, its registration number and current mileage.

Legal bases for data processing: Legitimate interest of the Controller pursuant to the GDPR Art. 6 (1), point f) regarding the necessity for us to provide such services as per your request.

Purpose of data processing: Processing related to the use of the service, including appointment booking.

Term of data processing: The applicable period of processing is 3 months from the date of use of the service, if we have no other legal basis for processing your data (for example, if you do not enter into a contractual relationship with us).

Data transmission: We may transmit your data to a local service provider to fulfill your request.

2.3 Request a Contact services

Scope of processed personal data: Your name (first name and last name), your phone number and e-mail address. You may give your consent to marketing purposes as well as per 2.4 of this Privacy Policy.

Legal grounds for data processing: Legitimate interest of the Controller pursuant to the GDPR Art. 6 (1), point f). We believe we have legitimate interest to get in contact with individuals interested in our services and product. We never contact you directly with offers without your consent as per 2.4 of this Privacy Policy.

Purpose of data processing: Provision of contact options in relation with our services or offers.

Term of data processing: The applicable period of processing is 3 months from the date of use of the service, if we have no other legal basis for processing your data (for example, if you do not enter into a contractual relationship with us).

Data transmission: no transmission in place.

2.4 Keep me informed – marketing consent

Scope of processed personal data: Your name (first name and last name), your phone number and e-mail address.

Legal bases for data processing: Consent of the data subject pursuant to the GDPR Article 6 (1), point a). The consent can be revoked any time by a statement sent to the Controller.

Purpose of data processing: You may receive marketing information about our services and products via telephone call, SMS message or e-mail.

Term of data processing: You can revoke your consent to the processing of your data any time. We may process your personal data until your consent is revoked.

Data transmission: no transmission in place.

3. SHARING PERSONAL DATA

We do not sell, otherwise disclose, or share data we collect and hold about you, except as described in this Privacy Policy.

We may share your personal data with third parties as described below:

- third party service providers who have been appointed as data processors to perform functions and services on our behalf and who will be provided only with personal data necessary to perform the services on our behalf but are not authorised by us to use such

data for any other purposes (e.g. providers of services in respect of web hosting, payment processing, information technology systems, customer relationship management);

- local dealers and technical service providers assisting us in the performance of a contract or to comply with applicable legal requirements or in case its necessary for our legitimate interests;
- if we are required to do so by law or pursuant to legal process or to comply with any applicable rules or regulations, or in response to a legitimate request from a law enforcement authority or other government official; and
- we reserve the right to transfer personal data about you in the event that we sell or transfer all or a portion of our business or assets, in accordance with applicable law. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use data you have provided to us in a manner that is consistent with this Privacy Policy.

4. DATA TRANSFERS

We may transfer to, and store the data we collect about you in, countries other than the country in which the data was originally collected, including the United States or other destinations outside the European Economic Area (“EEA”) and the United Kingdom. Those countries may not have the same data protection laws as the country in which you provided the data. When we transfer your data to other countries, we will protect the data as described in this Privacy Policy and comply with applicable legal requirements providing adequate protection for the transfer of data to countries outside the EEA and outside the United Kingdom.

If you are located in the EEA or the United Kingdom, we will only transfer your personal data if:

- the country to which the personal data will be transferred has been granted a European Commission adequacy decision; or
- we have put in place appropriate safeguards in respect of the transfer, for example we have entered into EU standard contractual clauses and required additional safeguards with the recipient, or the recipient is a party to binding corporate rules approved by an EU or UK supervisory authority.

5. LEGAL RIGHTS OF THE DATA SUBJECTS

As a data subject you can request information about the processing of your personal data, and can request the rectification of your personal data, or the erasure of such data – with the exception of mandatory data processing - revocation of data, you can exercise your right to data portability and objection in the manner indicated when recording data.

Pursuant to Articles 15 to 20 of the GDPR as a resident of the European Economic Area (or where for other reasons the GDPR applies) you have the following rights in relation to your Personal Data:

- a) right to get information regarding our processing;
- b) right to access your personal data;
- c) right to rectification;
- d) right to erasure of your data;
- e) right to the restriction of processing;
- f) right to the portability of data (transmit your data to another data controller);
- g) right to object against our processing.

You can exercise your rights through inquiries sent to the contact options of the Data Controller. You have the right to be informed of the types of personal data that we store in relation to you. You also have the right to request access to your personal data (right to access). If the request affects the rights and freedoms of others or is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee or in exceptional cases refuse to act on the request.

You have the right to rectify the incorrect data or erase it, or to request the restriction of data processing (right to rectification and erasure). If we process your data based on our legitimate interest, you can object to the data processing (right to object).

You are also entitled to receive your personal data processed by us in a commonly used, machine-readable format and to forward it to another data processor, or you can ask us to forward it for you, if the legal prerequisites are met (right to data portability). If we process your data based on your consent, you can withdraw your consent any time, but this will not affect the lawfulness of the previous data processing.

You have the right to file a complaint at the supervisory authority in the member state of your usual residence, workplace or the place of the assumed injury in particular if according to the assumption of the processing of personal data of the data subject violates the provisions of GDPR.

6. CHANGES TO THIS PRIVACY POLICY

We will update this Privacy Policy when necessary to reflect changes in applicable law, our Products, what personal information we collect, or how we use personal information. When we post changes to the Policy, we will change the "Updated on" date at the top of the Policy. If we make material changes to the Policy, we will provide notice or obtain consent regarding such changes as may be required by law.