

TEVVA PRIVACY NOTICE: DRIVERS

Version 1.1 March 20, 2023

1. SCOPE

This privacy notice sets out how we process the personal data of the Drivers of our Tevva vehicles, where the term "Driver" means any driver or other individual authorised by the owner of a Tevva vehicle or a Tevva customer to operate the vehicle. For the avoidance of doubt, it does not apply to Tevva employees or other Tevva personnel. The notice applies regardless of the context in which you are driving a Tevva vehicle (for example, whether you are the owner of the vehicle or an employee of the owner). If you are not a Driver then it may be that a different Tevva Privacy Notice may apply to you (for example, because you are interacting with the Tevva website). Please click here for further details regarding our privacy notices: [Tevva Privacy Policy](#)

For the purpose of applicable data protection legislation (including but not limited to the EU GDPR and UK GDPR), the company which is the controller and who is responsible for your personal data is **Tevva Motors Limited, Tevva London**, Unit 1, London Distribution Park, Windrush Road, Tilbury, Essex, England, RM18 7EW ("**Tevva**" or "**us**" or "**we**").

This privacy notice replaces and supersedes any previous notices addressing the same or similar issues, whether formal or informal. Tevva reserves the right in its absolute discretion to alter, amend, or replace this privacy notice in whole or in part at any time with or without notice. The latest version of this notice can be found here: [Tevva Privacy Policy](#). You should always check that you are referring to the latest version of this notice if you have previously downloaded or received a hard copy of the notice.

2. TYPES OF PERSONAL DATA COLLECTED

Depending on the relevant circumstances and applicable local laws and requirements, we will collect some or all of the information listed below in relation to Drivers and the time during which they are driving a Tevva vehicle:

- **Driver Identification Number** such as the Driver ID (which can be attributed to your name and email address via the telematics system). Please refer to Section 3 of this privacy notice to understand more about how we collect your personal data.
- **Driver Behaviour and Performance Data** such as location, speed, lateral and longitudinal acceleration, time of journey, and journey distance.
- **Vehicle Performance Data** such as the Vehicle ID, battery usage, temperature and status, motor usage, temperature and status, charging voltage and status.
- **Fuel Cell and Performance Data** (where relevant) such as hydrogen consumption, stack temperatures and fuel cell system usage and status.

3. HOW YOUR PERSONAL DATA IS COLLECTED

Whenever you are driving a Tevva vehicle, where appropriate and in accordance with any local laws and requirements, we may collect your data either interactively over the wireless network (via a telematics system) or through the use of a fitted tachograph in the vehicle which would then pass through the vehicle's controller area network (CAN).

4. WHY WE HOLD YOUR PERSONAL DATA AND THE LEGAL BASIS WE RELY UPON

We have set out in the table below the key purposes for which we use your personal data, as well as the types of personal data used and the lawful bases relied upon for that use in accordance with applicable data protection law.

Why do we hold this data?	What types of personal data?	What legal basis do we rely upon?
<p>To perform research and development to enhance and maintain the vehicles and services and to develop new vehicles and services.</p>	<ul style="list-style-type: none"> • Driver Behaviour and Performance Data • Vehicle Performance Data 	<p>Legitimate interests, namely it is in our interests:</p> <ul style="list-style-type: none"> • to develop our future products and services; • to ensure our business runs smoothly; and • to safeguard our business interests. <p>We may also need to process your data to comply with our legal obligations.</p>
<p>To carry out analytics and provide management information to our corporate customers about driver efficiency and behaviour.</p>	<ul style="list-style-type: none"> • Driver Behaviour and Performance Data • Driver ID • Vehicle Performance Data 	<p>Necessary for the performance of a contract. It may be necessary for us to process certain personal data about you in order for us to perform our obligations pursuant to the agreement in place with you as our customer.</p> <p>Legitimate interests, namely it is in our interests:</p> <ul style="list-style-type: none"> • to ensure our business runs smoothly; • to safeguard our business interests; and • to provide our services to our Corporate Customers.
<p>To help us to establish, exercise, or defend legal claims.</p>	<ul style="list-style-type: none"> • Driver ID (name and email address) • Organisation details (e.g. your place of work, job title and organisation contact information) • Driver Behaviour and Performance Data • Vehicle Performance Data 	<p>Legitimate interests, namely it is in our interests for us to be able to establish and defend our legal rights and understand our obligations, and seek legal advice in connection with them.</p>

5. HOW DO WE SHARE YOUR PERSONAL DATA?

At Tevva, we do not share, rent or trade your information with third parties for marketing or promotional purposes. When necessary, we may share information about you with the following recipients:

- any Tevva group companies;

- our Corporate Customers (where relevant);
- third party service providers (including suppliers) who perform functions on our behalf (including IT service providers as well as professional advisers such as lawyers, auditors and accountants); and
- tax, audit, regulatory bodies, or other public authorities of competent jurisdiction.

In addition, if Tevva merges with or is acquired by another business or company in the future, we may share your personal data with the new or prospective owners of the business or company as part of the merger or acquisition process.

6. **HOW DO WE SAFEGUARD YOUR PERSONAL DATA?**

We are committed to taking all reasonable and appropriate steps to protect the personal data that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational security measures. In particular, any data transferred from a Tevva vehicle to a third party cloud-based storage provider will be encrypted both in transit and in storage via the third party service provider.

7. **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

The precise length of time for which we keep any data depends on the type of data, our legitimate business needs, and other legal requirements that may require us to retain it for certain minimum periods.

In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal and risk management obligations, as described above).

Once we have determined that we no longer need to hold your personal data, we will delete it from our systems in accordance with applicable law.

8. **HOW TO CONTACT US**

If you would like further information about how we handle your personal data, if you have any concerns regarding this privacy notice, or if you wish to exercise your legal rights, please contact us at:

privacy@tevva.com

Do we Transfer Your Data to other countries?

We do not ordinarily transfer your personal data overseas. However, in the event your personal data is transferred to countries outside of the EEA or the UK, we will take reasonable steps to ensure that your personal data is treated securely and the means of transfer provide adequate safeguards, for example using Standard Contractual Clauses as approved by the European Commission and/or the UK.

9. **YOUR RIGHTS**

Subject to certain exceptions, by law you have several rights in relation to how your personal data is used. If you want to exercise your rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal data. Except in rare cases, we will make sure to respond to you within one month from the later of (i) the date that we have confirmed your identity, or (ii) the date we received your request.

Right of access (also known as Subject Access Requests)

You may ask us for a copy of the information we hold about you. If we provide you with a copy, we will not charge you. If you request further copies of this information from us, we may charge you a reasonable administrative cost. We will only refuse your request in very limited circumstances as permitted by law, and we will always explain to you the reasons why we are not fulfilling your request.

Right to correct the data we hold about you

You have the right to ask us to correct any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them, unless this is impossible or involves disproportionate effort.

Right to object

You can object to us using your data if we are using it for the purpose of our legitimate interests.

If we agree that your objection is justified, we will permanently stop using your information for those purposes. Otherwise we will explain why we need to continue using your data (for example, explaining that we need to use your data in connection with a legal claim).

Right to withdraw consent

Where we have asked your permission to use your personal data for certain activities, you may withdraw your permission at any time by emailing or calling us at the contact details set out below and we will stop using your data for that purpose.

Right to erasure

In certain cases, you have the right to ask us to "erase" your personal data. Normally, you can do this where:

- it's no longer necessary for us to use your data;
- we were relying on your consent to use your data and you have withdrawn your consent;
- your data has been used unlawfully;
- your data needs to be erased in order for us to comply with our obligations under law; or
- you object to the processing and we don't have a compelling reason to continue using it.

In these cases, we will take all reasonably practicable steps to erase the relevant data. We will only refuse to comply with your request to erase your data in limited circumstances, and we will always tell you our reason for doing so.

Right to restrict our use of your personal data

You can ask us to suspend our use of your personal data in certain circumstances. For example, during the time it takes us to respond to your request to correct the data we hold about you.

Right to move your data

You have the right to ask us to transfer certain personal data we hold about you to another third party service provider. Alternatively, you may ask us to transfer the data directly to you.

Rights relating to automated decisions

In certain circumstances, you may contest a decision made about you based on automated processing. We do not generally make decisions based solely on automated processing of your personal data, but when we do so, we will let you know.

Right to complain

You have the right to lodge a complaint with your local data protection supervisory authority, which is the Information Commissioner's Office in the UK.