

DRAGONMOBILITY LTD

PRIVACY POLICY

Dragonmobility Ltd ("we", "our", "us" or "Dragonmobility") is committed to protecting the privacy of all users of our paid and voluntary products and services (together, the "Products"). Please read the following privacy policy that explains how we use and protect your information. We'll be the "data controller" of the information you provide to us.

1. CONTACT DETAILS

If you have any queries or requests concerning this privacy policy or how we handle your data more generally, please get in touch with us using the following details.

By contacting our general customer services team at: dragon@dragonmobility.com

By contacting our Data Protection Officer: dpo@dragonmobility.com

2. HOW WE COLLECT YOUR INFORMATION

We collect your personal information when you interact with us or use our services, such as by telephone or email, when we visit you or you visit us. We also look at how visitors use our online marketing such as our website(s), to help us improve our services and optimise customer experience.

We collect information:

- when you request initial information about our Products;
- during the preparation for you placing an order with us and during the order process (including for payment and order fulfilment); and
- when you contact us directly via email, phone, post, message or via any online chat function;

We may also collect information from third parties and via social media. These may include your friends, extended family members, professional advisors, funders and potential donors.

3. INFORMATION THAT WE COLLECT FROM YOU

As part of our commitment to the privacy of our customers and future customers more generally (and anyone who has responsibility for them), we want to be clear about the sorts of information we will collect from you about you and/or someone for whom you have responsibility (together "you", "your" or "yours")

When you contact us, you are asked to provide information about yourself including your name, contact details, address, school or place of work, your measurements, disability, personal needs, order specifications and payment information such as bank details.

We also collect information about your usage of the Products and information about you from any messages you post to Dragonmobility's social media or when you contact us or provide us with feedback, including via e-mail, letter, phone or chat function. If you contact us by phone, we may record the call for training and service improvement purposes, and make notes in relation to your call.

We process health information about you and photographs of you for the purposes of providing the Products and recording details of the Products provided, and we process this information strictly securely and only when necessary for legitimate purposes.

We will only use images of you in our marketing materials when express consent has been given.

4. USE OF YOUR INFORMATION

We will only process the data we collect about you if there is a reason for doing so, and if that reason is permitted under data protection law. We will have a lawful basis for processing your information:

- if we need to process your information in order to provide you with the service you have requested or to enter into a contract;
- we have your consent;
- we have a justifiable reason for processing your data; or
- we are under a legal obligation to do so.

Where we need to, in order to provide you with the service you have requested or to enter into a contract, we use your information

- to enable us to provide you with our Products;
- to supply the services you have requested;
- to enable us to collect payment from you; and
- to contact you where necessary concerning our services, such as to resolve issues you may have with your order.

We also process your data where we have a justifiable reason for doing so— for example personalisation of our service, including processing data to make it easier and faster for you to obtain services. We have listed these reasons below:

- to improve the effectiveness and quality of service that our customers can expect from us in the future;
- to tailor content that we or our third party partners display to you, for example so that we can show you events or services which are specific to your age or disability or make sure you see the advertising which is most relevant to you, based on characteristics determined by us;
- to enable our customer support team to help you with any enquiries or complaints in the most efficient way possible;
- to contact you for your views and feedback on our services and to notify you if there are any important changes or developments to the Products, including letting you know that our services are operating in a new way, where you have asked us to do so;

- to analyse your activity in your interactions with us so that we can administer, support, improve and develop our business and for statistical and analytical purposes and to help us to prevent fraud;
- to enforce our contractual terms with you and any other agreement, and for the exercise or defence of legal claims and to protect the rights of Dragonmobility, its professional partners, couriers, or others (including to prevent fraud); and
- if you submit comments and feedback regarding the Products and the services, we may use such comments and feedback in marketing or advertising materials. We will only identify you for this purpose by your first name and the city in which you live.

We will also analyse data about your use of our services. This means that we may make certain assumptions about what you may be interested in and use this, for example, to send you more tailored marketing communications, to present you with services that we think you will find useful, or to let you know about special offers or products which we think you may be interested in. This activity is referred to as “profiling”. You have certain rights in relation to this type of processing. Please see 'Your Rights' section below for more information.

Where we rely on legitimate interest as a basis for processing your personal information, we carry out a ‘balancing test’ to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests. You can find out more information about these balancing tests by contacting us using the details above.

Where we are under a legal obligation to do so we may use your information to:

- create a record of your order(s);
- comply with any legal obligation or regulatory requirement to which we are subject.

5. LIVES SET IN MOTION

We also process your information to determine whether you may be interested in services available through Lives Set in Motion CIC, our community interest partner. These are philanthropic services which we may acquire for you, according to need and outside your paid-for contract with us.

Where we think you may be interested in Lives Set in Motion services, we may contact you (by email or telephone) using the contact details you have provided to let you know about them. We are the controller of this information. You have the right to opt out of receiving these types of communications and may do so by contacting us using the details above.

If someone else procures Lives Set in Motion services for you, we will contact you to let you know what has been made available to you.

6. DECISION MAKING

We conduct fraud checks on all customers. Where we believe we may detect fraudulent activity we may block you from placing an order and using our Sites.

We share your information with our partners and undertake fraud checks on all customers because this is necessary for us to perform our contracted services to customers, by ensuring that the services we provide are duly paid for, and also so that individuals themselves are protected from fraudulent transactions.

The checks and decisions that may be made look at various components including known industry indicators of fraud. When the possibility of a fraudulent transaction is indicated, we may decline an order or even block you from our services.

You have certain rights in respect of this activity - please see 'Your Rights' section below for more information. Our fraud detection is in place to protect all of our customers as well as Dragonmobility and our partners. You have the right to contest any fraud decision made about you and to be given more information about why any such decision was made by contacting us in line with section 1 above.

7. RETENTION OF YOUR INFORMATION

We will not retain your information for any longer than we think is necessary.

Information that we collect will be retained for as long as needed to fulfil the purposes outlined in the 'Use of my information' section above, in line with our legitimate interest or for a period specifically required by applicable regulations or laws, such as retaining the information for regulatory reporting purposes.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involved;
- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- our legitimate interests where we have carried out balancing tests (see section on 'How we use your personal information' above);
- (potential) disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information where we no longer require your information for the purposes collected.

8. DISCLOSURE OF YOUR INFORMATION

The information we collect about you will be transferred to and stored on our servers located within the EU. We are very careful and transparent about who else your information is shared with.

Sharing your information internally

We share your information with other Dragonmobility group companies or partners only where necessary for the purposes set out in section 4.

Sharing your information with third parties

We share your information with third party service providers. The types of third party service providers whom we share your information with includes:

- Payment providers (including online payment providers and fraud detection providers) for the purposes of providing services to us, for example when they process information such as credit card payments for us, provide support services to you or carry out fraud checks for us;
- IT service providers (including cloud providers) for the purposes of data storage and analysis;
- Engineering suppliers so that they can help us to fulfil your order, be made aware of any of your personal data which is necessary to meet the specification of the components they supply, resolve issues, or improve their services;
- Couriers so they can deliver physical items to you; and
- Customer support partners (for instance, local mechanics and technicians) who will help us to resolve any issues you may have with our Products.

Dragonmobility will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this privacy policy when it is transferred to third parties.

If our business enters into a joint venture with, purchases or is sold to or merged with another business entity, your information may be disclosed or transferred to the target company, our new business partners or owners or their advisors.

We may also share your information:

- if we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation or regulatory requirement. This includes exchanging information with other companies and other organisations for the purposes of fraud protection and prevention;
- in order to enforce our contractual terms with you and any other agreement;
- to protect the rights of Dragonmobility, its third party suppliers, couriers, third party technicians, or others, including to prevent fraud; and
- with such third parties as we reasonably consider necessary in order to prevent crime, e.g. the police.

International transfers of data

In some cases the personal data we collect from you might be processed outside the European Economic Area ("EEA"), such as the United States, China and the countries in which Dragonmobility purchases components. These countries may not have the same protections for your personal data as the EEA has. However, we are obliged to ensure that the personal data that is processed by us and our suppliers outside of the EEA is protected in the same ways as it would be if it was processed within the EEA. There are therefore certain safeguards in place when your data is processed outside of the EEA.

We ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- your personal data is transferred to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- we use the EU approved Standard Contractual Clauses; and
- where your personal data is transferred to third party providers based in the US, data may be transferred to them if they have self-certified under the Privacy Shield framework in relation to the type of data being transferred, which requires them to provide similar protection to personal data shared between the EU and the US.

Please contact us using the contact details above if you want further information on the countries to which personal data may be transferred and the specific mechanism used by us when transferring your personal data out of the EEA.

9. SECURITY

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected.

We take steps to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted via email or through our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

10. YOUR RIGHTS

Under data protection law, you may have a number of rights concerning the data we hold about you. If you wish to exercise any of these rights, please contact our Data Protection Officer using the contact details set out above. For additional information on your rights please contact your data protection authority and see below.

The right to be informed. You have the right to be provided with clear, transparent and understandable information about how we use your information and your rights. This is why we're providing you with the information in this policy.

The right of access. You have the right to obtain access to your information (if we are processing it). This will enable you, for example, to check that we are using your information in accordance with data protection law. If you wish to access the information we hold about you in this way, please get in touch (see Contact Details).

The right to rectification. You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold by contacting us (see Contact Details).

The right to erasure. This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you by contacting us (see Contact Details).

The right to restrict processing. You have rights to 'block' or 'suppress' further use of your information. When processing is restricted, we can still store your information, but will not use it further.

The right to data portability. You have the right to obtain your personal information in an accessible and transferrable format so that you can re-use it for your own purposes across different service providers. This is not a general right however and there are exceptions. To learn more please get in touch (see Contact Details).

The right to lodge a complaint. You have the right to lodge a complaint about the way we handle or process your information with the national data protection authority.

The right to withdraw consent. If you have given your consent to anything we do with your information (i.e. we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. You can do this by contacting us (see Contact Details). Withdrawing consent will not however make unlawful our use of your information while consent had been apparent.

The right to object to processing. You have the right to object to certain types of processing, including processing for direct marketing and profiling.

11. CHANGES TO OUR PRIVACY POLICY

Any changes to our Privacy Policy will be posted to our website(s) and, where appropriate, we will notify you of the changes for example by email or post.

This Privacy Policy was last updated: 24/05/2018

12. COMPLAINTS

If you are not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) using the following details:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113

Website: www.ico.org.uk