

DriVe Safe App – Privacy Statement

This statement explains how Vodafone processes your data for the DriVe Safe App.

We may need to update this statement; if we do we will update the notice in the App.

Last updated: 31/07/2019

What is DriVe Safe App?

The DriVe Safe App is a digital App and gamified experience for Vodafone employees and 3rd party suppliers who drive as part of their roles. The App will deliver tailored safety learning and training content for users that is easily accessible on their mobile devices. The content focusses on the key factors which continue to be the primary cause of road incidents reported at Vodafone. We hope DriVe Safe will encourage adoption of safe driving behaviours, educate drivers on Vodafone road safety requirements and our 'Absolute Rules' relating to driving.

Who we are

We are Vodafone Group Services Ltd. If you go to <http://www.vodafone.com/content/index/about/where.html> you can find links to the Vodafone operating company in your country.

In this privacy policy:

- “we/us” means Vodafone Group Services Ltd.
- “third party” means someone who is not you or us; and
- “Vodafone Group” means Vodafone Group Services Ltd and any company or other organisation in which Vodafone Group Plc owns more than 15% of the share capital.

Our registered office is Vodafone House, The Connection Newbury, Berkshire RG14 2FN. We are registered in England under company number 1833679. Vodafone Group PLC is registered with the Information Commissioner's Office (ICO), registration number Z8088474.

How to contact us

Your opinion matters to us – if you have any questions about our privacy policy, you can email us at: Ask.GroupPrivacy@vodafone.com or you can write to our privacy team at:

Global Privacy Team – Group Legal
Vodafone Group Services Limited
Vodafone House
The Connection
Newbury
RG14 2FN
England

Personal information we collect about you

We collect your personal information when:

- You register as a user on the DriVe Safe App
- Subsequently as you use the DriVe App

Information we collect about you:

- The personal information you provide when you register to sign-up to the DriVe Safe App, such as your username, password and email address
- The personal information generated by your use of the DriVe App Safe, your location, duration of play, progress on games

How we use your personal information

We use your personal information

1. To provide you with an account to use service you sign-up to when registering for the Drive Safe App
1. To help us and our third party software partners involved in the delivery of our service, to provide information and updates relevant to your use of the App
2. To enable us and our third party software provider involved in the delivery of our service to offer you alerts based on your location
3. To help us analyse platform performance and issues/bugs and remedy these to improve your experience of the Drive Safe App
4. So we can communicate information to you about the platform, including planned changes and new developments

How we share your personal information

We share information about you with our third party software provider 'Make Real' who deliver the service to you. They may also share information about you back to Vodafone for the purposes of reporting on usage.

International data transfers

In doing the above, we may need to transfer personal information about you to other companies in the Vodafone Group or third parties located (or whose servers may be located) in countries outside of where you are employed, including countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organizational measures to protect your personal information.

Contact your local Privacy team if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers.

How long we keep your personal information for

We keep your personal information for as long as you are a registered user of the Drive Safe App. You can choose to delete your account at any time, in which case all of your information will be deleted without undue delay.

Keeping your personal information secure

Vodafone is committed to protecting your personal information. We apply strong security and privacy measures to protect your personal information from unauthorised access, use, loss, disclosure or destruction. For example, we encrypt your personal information when it is transmitted, and we store it in a controlled environment with limited access. Our dedicated security and privacy teams conduct assessments on our products, services and operations to ensure our privacy and security policies are implemented. Our suppliers and others who process personal information on our behalf are expected to comply with our high standards. Vodafone employees and approved third parties who need access to personal information are subject to internal policies, strict confidentiality obligations and training. We monitor the implementation of these internal policies. Failure to comply with our policies may lead to investigation and possible disciplinary action. Vodafone complies with applicable data protection laws, including applicable data breach notification laws.

Your rights

Below we set out details on how you can exercise your rights. If you would like to exercise any of these rights, please contact: help.drive@vodafone.com

- You have the right to correct personal data – this can be done in your profile in the Drive Safe App
- You have the right to request a copy of your personal data in the Drive Safe App
- You have the right to data portability
- You have the right to object to use of personal data in the Drive Safe App – you can control some of these settings in the App or on your device e.g. location data sharing
- You have the right to restrict the use of your personal data
- You have the right to have your personal information deleted from the Drive Safe App

How to lodge a complaint

If you want to contact us about any of your rights or if complain about how we use your information, contact our Health & Safety team on help.drive@vodafone.com. We'll do our best to help but if you're still unhappy, you can contact the LOCAL REGULATOR: e.g. ICO – their details are at www.ico.org.uk