

## **Shell Privacy Policy**

This is the Privacy Policy for the Shell Drive Partner application. This Privacy Policy provides information on the processing of your personal data as a result of being a user of the Shell Drive Partner application by Shell U.K. Oil Products Limited or one of its affiliates (**Shell**).

This Privacy Policy may be changed over time. You are advised to regularly review the Privacy Policy for possible changes. This Privacy Policy was last changed on **1<sup>st</sup> June 2015**..

### **Special Notice – age restriction**

This App is intended for motorists only and should not be used by anyone who is not legally entitled to drive. If you are not legally entitled to drive please do not use this App and / or send us your personal data (for example your name, age, address or email address).

#### **1 When is this Privacy Policy applicable?**

This Privacy Policy provides information on the processing of your personal data as a result of being a user of the Shell Drive Partner application (**App**).

In the App you may find a number of links to other websites or applications. Although these websites or applications are selected with care, we are not responsible for the processing of your personal data through these websites or applications. This Privacy Policy is therefore not applicable to the use of such websites or applications.

#### **2 Who is the controller of your data?**

Shell U.K. Oil Products Limited a company registered in England and Wales under Company No. 3625633, having its registered office at Shell Centre, London SE17NA, England, acting as agent for Shell U.K. Limited, registered in England and Wales under company no. 140141, having its registered office at Shell Centre, London SE17NA is the controller for the processing of your personal data.

#### **3 For what purpose do we process your personal data?**

In this Privacy Policy we describe what personal data we process and for what purposes.

##### **3.1 Customer service and relationship management**

⇒ What does this purpose entail?

If you contact our Customer Service Centre with a question or a complaint, we may ask you for certain information to identify yourself and to help us respond to your enquiry. We use any personal data supplied only for this purpose and to improve our customer support services.

⇒ Which personal data do we process for this purpose?

To be able to respond appropriately to your question or complaint, we note details of your question or complaint in our customer database. We may also ask you for contact details in order to keep you informed about your question or complaint.

### **3.2 Development and improvement of products and services**

⇒ What does this purpose entail?

Shell regularly conducts market research with its customers through the use of surveys. We use your responses to such surveys for quality assessments and to improve your customer experience.

⇒ Which personal data do we process for this purpose?

If you choose to participate in our surveys, we may process the personal data provided by you (including your name, age, address and e-mail address).

### **3.3 Technical and functional management of the App**

⇒ What does this purpose entail?

When you visit or use the App, we process some technical information about you (such as your IP address) to provide you the functionalities of our online services and to manage them. With this technical information we are able to manage the App, for example to resolve technical failures or to improve their reliability.

⇒ Which personal data do we process for this purpose?

We process technical data such as the IP address of your computer, tablet or smartphone, details of the pages you have visited on the App, the web browser you use to surf, previous/subsequent sites that you have visited and the length of your visit/session.

### **3.4 The generation of management information and statistical data**

⇒ What does this purpose entail?

Shell performs research into market trends through statistical analysis. We use the results of such research to evaluate our current products and services and to adapt our products, marketing and service stations to new developments. The research results are only reported on an aggregate basis.

### **3.5 Preventing, detecting and investigating fraud**

⇒ What does this purpose entail?

Shell may use the personal data you provide Shell to prevent, detect and investigate fraud and to enforce its Terms and Conditions.

### **3.6 Feedback and forum facilities**

If at any time this App offers any feedback and/or forum facilities (or similar), Shell may collect the information that you disclose in using such facilities. Such information will be used in accordance

with this Privacy Policy. Please note that Shell cannot be held responsible for other parties' use of the personal data which you make available to such third parties through any feedback or forum facilities in this application. Please be careful about what personal data you disclose in this way.

#### **4 Who has access to your data?**

Shell may disclose your personal data to any of the following:

- Authorized third party companies that are permitted to supply products and/or services to you;
- Any agents, service providers and/or subcontractors of Shell and its affiliates;
- Any person to whom Shell proposes to transfer any of its rights and/or duties.

Shell uses third parties for certain processings, such as website hosting. The collected personal data may be transferred to authorized third parties, which may be located outside of the Economic European Area (**EEA**) as part of the services offered to you. By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA or one of our service providers is located in a country outside of the EEA. As far as these third parties have access to personal data in order to execute these processings, Shell has taken the required organizational and/or contractual measures to ensure that your personal data is exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard your personal data.

Except as set out in this Privacy Policy, we will not disclose any personal data without your permission unless we are legally entitled or required to do so or if we believe that such action is necessary to protect and/or defend our rights, property or personal safety and those of our users/customers or other individuals. Only if Shell is required to do so by law, will your personal data be provided to supervisory agencies, fiscal authorities and investigative agencies.

#### **5 For what period do we retain your personal data?**

Upon your request or by deleting the App we will close the applicable accounts as soon as reasonably possible. We will also close or deactivate inactive customer accounts and close accounts that are used in violation of this Privacy Policy or applicable Terms and Conditions. Personal data from closed or deactivated accounts will be deleted or rendered anonymous as soon as is reasonably possible. Under certain circumstances we will retain personal data from closed or deactivated accounts for longer, such circumstances being the prevention of fraud or to otherwise take actions permitted or required by law.

#### **6 Which cookies does Shell use?**

The App uses cookies or similar technology. A cookie is a small text file that is sent to your internet browser so that we are able to recognise your browser when you return. Shell and its authorised service providers may use small graphic images known as 'clear GIFs' that work in conjunction with cookies to identify you and your use of the App. Shell and such service providers may also use other

technologies to store information in your browser utilising local shared objects or local storage, such as HTML 5 cookies, flash cookies and other web application software methods.

Using these technologies we can collect data on the use of the App such as which pages are visited, your interaction with information on the App and the duration of your visit.

Functional cookies – Shell stores cookies that are essential in providing the functionalities of the App. For instance, the cookies remember your preferences, such as language and region, which remain as your default settings when you revisit the App. However, should you wish to do so, you can choose to reject or block the cookies set by Shell by changing your browser settings – see the Help function within your browser for further details.

Web analytics cookies – Shell may use third party cookies for web analysis. Such cookies allow Shell to analyze the usage of the App. This relies on aggregated statistical data that Shell's authorised service providers provide Shell and allows Shell to understand the way you use the App. Shell and such service providers may only provide such data to third parties if this is required by law.

Advertising cookies – Shell may use third party cookies for advertising purposes. Shell may use authorised service providers to serve advertising on the App and other websites on the internet. Such service providers may place cookies on your browser, and may collect information that helps them identify your device, such as IP-address, or other unique or device identifiers.

Shell does not retain a cookie longer than necessary. We use session cookies and permanent cookies:

- A session cookie can track usage such as the webpages you visit and what options you use. When you close the internet browser, the session is ended and the cookie is deleted.
- A permanent cookie enables the App to recognize you at a subsequent visit. It remains on your system until you delete it.

Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual.

Note, however, that if you reject the use of cookies you will still be able to visit our websites but some of the functions may not work correctly and you may no longer be able to use all the functionalities of the App.

**7 How do we secure your personal data?**

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use.

**8 Who to address regarding questions and requests of access, removal etc.**

We aim to keep our data about you as accurate as possible. If you would like to review, change or delete the details you have supplied to us, please contact Shell at the address outlined in clause 2.