

## **ADVANCED DIAGNOSTICS PRIVACY POLICY**

**www.advanced-diagnostics.com**

Advanced Diagnostics Limited (“we”) are committed to protecting and respecting your privacy.

### **SCOPE OF POLICY**

This policy, together with our Website Terms of Use <https://www.advanced-diagnostics.com/files/Policies/Website%20Terms.pdf> and any other documents referred to in it set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, your rights in relation to your personal information and how you can contact us or the supervisory authorities in the event that you have a complaint. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.advanced-diagnostics.com](http://www.advanced-diagnostics.com), or <http://forum.advanced-diagnostics.com>, <http://iq.advanced-diagnostics.com> and any “advanced-diagnostics” domains and sub-domains operated by us from time to time. Our sites are not intended for children and we do not knowingly collect data relating to children.

Advanced Diagnostics Limited is the data controller and responsible for your personal data. Our registered office is at Diagnostics House, Eastboro Fields, Hemdale, Nuneaton, CV11 6GL.

### **INFORMATION WE MAY COLLECT FROM YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect and process the following personal data about you:

**“Information you give us (Submitted information)”**: You may give us information about you by filling in forms on our sites [www.advanced-diagnostics.com](http://www.advanced-diagnostics.com), <http://forum.advanced-diagnostics.com> <http://iq.advanced-diagnostics.com> and any “advanced-diagnostics” domains and sub-domains operated by us from time to time (“our Sites”), or by corresponding with us (for example, by phone, e-mail, chat or forum discussions). This includes information you provide when you register to use our Sites, download software, subscribe to any of our services, search for a service, and when you report a problem with a product, our services, or our Sites. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

**Information we collect about you.** Each time you visit our Sites we may automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Sites (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

**Location information.** We may also use location technology to determine your current location. Some of our location-enabled services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by email at [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com). Please note that if you remove location services it will have a detrimental effect on the services we supply to you.

**Information we receive from other sources (Third Party Information).** We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

If you contact us, we may keep a record of that correspondence.

**Identifying serial numbers:** when you install or uninstall a service containing a identifying serial number or when such a service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

## **COOKIES**

We use cookies to distinguish you from other users of our Sites. This helps us to provide you with a good experience when you browse and use our Sites and also allows us to improve our Sites. For detailed information on the cookies We use and the purposes for which We use them, see our cookie policy [https://www.advanced-diagnostics.com/files/Policies/ADL\\_Cookie\\_Policy.pdf](https://www.advanced-diagnostics.com/files/Policies/ADL_Cookie_Policy.pdf)

## **USES MADE OF THE INFORMATION**

We will only use your personal information when the law allows Us to. Most commonly we use information held about you in the following ways:

- **Information you give to us.** We will use this information:

to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about. We will only contact you for this purpose if you have consented to Us doing so. You have the right to withdraw your consent to marketing at any time by contacting us [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com)

to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you for this purpose if you have consented to Us doing so. You have the right to withdraw your consent to marketing at any time by contacting us [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com). If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the loader registration form, or contact Us to let Us know [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com)

to notify you about changes to our service;

to ensure that content from our Sites is presented in the most effective manner for you and for your computer.

- **Information we collect about you.** We will use this information:
  - to administer our Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our Sites to ensure that content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our service, when you choose to do so;
  - as part of our efforts to keep our Sites safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - to make suggestions and recommendations to you and other users of our Sites about goods or services that may interest you or them. We will only contact you for this purpose if you have consented to Us doing so. You have the right to withdraw your consent to marketing at any time by contacting us [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com) **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive). We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

We use information held about you in the following ways:

| Submitted Information    | Purpose   |
|--------------------------|---|
| Name                     | Addressing and identifying you                                    |
| Address                  | Identifying you   |
| Username                 | Access to services, Website, forum/ identification                |
| Password                 | Access to services, Website, forum/                               |
| Company                  | Addressing the customer/ identifying customer                     |
| AD Product serial number | Access to services, identification                                |
| Email address            | Administration of account, email marketing, support communication |
| Phone                    | Technical support   |
| DOB/ Age                 | Identification verification                                       |
| Purchase information     | Identification, services warranty                                 |

| Device information  | Purpose                    |
|---------------------|----------------------------|
| Make                | Analytics and bug tracking |
| Model               | Analytics and bug tracking |
| OS version          | Analytics and bug tracking |
| Application version | Analytics and bug tracking |

|                        |           |
|------------------------|-----------|
| Language of the device | Analytics |
|------------------------|-----------|

| <b>Content Information</b> | <b>Purpose</b>   |
|----------------------------|--|
| Vehicle access details     | Customer trends to aid in knowing what software to develop |
| Search run                 | Customer trends in vehicle worked on                       |
| App usage                  | Customising and streamlining of the App                    |

| <b>Log information</b> | <b>Purpose</b>                                 |
|------------------------|--|
| Debugging              | Debug information to assist in App development |

| <b>Location information</b> | <b>Purpose</b>  |
|-----------------------------|---|
| Approx. location            | Use to provide details for use in Push notification and analytics |

## **DISCLOSURE OF YOUR INFORMATION**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We may share your personal information with selected third parties:

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

If Advanced Diagnostics Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.

In order to protect the rights, property or safety of Advanced Diagnostics Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

Analytics and search engine providers that assist us in the improvement and optimisation of our Sites.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use, <https://www.advanced-diagnostics.com/files/Policies/Website%20Terms.pdf>,

<https://www.advanced-diagnostics.com/files/Policies/EULA.pdf> and other agreements; or to protect the rights, property, or safety of Advanced Diagnostics Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party business partners or service providers to use your personal information for their own purposes, unless you have expressly consented to this, and only permit them to process your personal information for specified purposes and in accordance with our instructions.

## **WHERE WE STORE YOUR PERSONAL DATA**

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), where you have expressly consented to us doing so, where the transfer is necessary for the performance of a contract between us and you (or for pre-contractual steps taken at your request), or where the transfer is necessary for the performance of a contract made in your interests between us and a third party. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Whenever we transfer your personal information out of the EEA, we ensure a similar degree of protection is afforded to it including, for example:

- transferring your personal information to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us at [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Sites; 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.

Services we offer on our Sites include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

## **HOW LONG WE YOU USE YOUR PERSONAL DATA FOR**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **YOUR RIGHTS**

You have the right to object to us processing your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not checking the relevant boxes on the loader registration form and forum forms we use to collect your data. You can also exercise the right at any time by contacting us at Diagnostics House, Eastboro Fields, Hemdale, Nuneaton, CV11 6GL or [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com).

Where you do provide your consent for us to use your personal information for marketing purposes and/or to us disclosing your information to any third party for such purposes, you can withdraw that consent at any time by contacting us at Diagnostics House, Eastboro Fields, Hemdale, Nuneaton, CV11 6GL or [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com).

Under certain circumstances, you have rights under data protection laws in relation to your personal information. Please click on the links below to find out more about these rights:

- Request access to your personal data <https://gdpr-info.eu/art-15-gdpr/>
- Request correction of your personal data <https://gdpr-info.eu/art-16-gdpr/>
- Request erasure of your personal data <https://gdpr-info.eu/art-17-gdpr/>
- Object to processing of your personal data <https://gdpr-info.eu/art-21-gdpr/>
- Request restriction of processing your personal data <https://gdpr-info.eu/art-18-gdpr/>
- Request transfer of your personal data <https://gdpr-info.eu/art-20-gdpr/>
- Right to withdraw consent <https://gdpr-info.eu/art-7-gdpr/>

If you wish to exercise any of the rights set out above, please contact us at [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com)

## **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **YOUR LEGAL RIGHTS**

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal

claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### **THIRD PARTY LINKS**

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

### **CHANGES TO PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or when you next visit our Sites. This policy was last updated on 4<sup>th</sup> June 2018.

### **DATA PROTECTION OFFICER**

The Advanced Diagnostics data protection officer is Adrian Rickus.

### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Diagnostics House, Eastboro Fields, Hemdale, Nuneaton, CV11 8GL or [data.protection@advanced-diagnostics.com](mailto:data.protection@advanced-diagnostics.com).

June 2018 Edition