



PRIVACY POLICY

Your privacy is very important to us, and we want to ensure that you understand how we use your data. This Privacy Policy details the types of information that we gather about you, how we use it and what your rights are.

WHO WE ARE

We are **MOBILITYWAYS LIMITED**, a private limited company incorporated and registered in England and Wales with the company number 03968472 whose registered office is at 10-12 St. Andrews Street, Norwich, England, NR2 4AF ("**Mobilityways**", "**we**" or "**us**").

We comply with the Data Protection Act 2018 and the UK GDPR (Retained Regulation (EU) 2016/679), the Data (Use and Access) Act 2025 and all applicable data protection and privacy laws and regulations ("**Data Protection Laws**"). We are registered with the Information Commissioners Office under registration number Z5010286.

We act on behalf of our Clients as a 'data processor' for most Mobilityways services, but to the extent that we process Personal Data for our own purposes, we will be an independent Data Controller of that Personal Data. Where we act as a processor for a Client that is your employer, your employer should inform you about any relevant processing of your Personal Data and we recommend that you refer to their privacy notice for further details.

TYPES OF PERSONAL DATA THAT WE COLLECT

Accessing our Platforms

When you register with us as either a 'Client' (on our Business Terms and Conditions) or a 'Member' (on our Member Terms and Conditions) to use and access our "Platforms" (i.e. Mobilityways' proprietary software platforms and applications that users can use to access elements of the Mobilityways services electronically), we will collect your Personal Data in the following circumstances:

Clients:

Data Type	Mandatory / Optional	Reason for Collection
Client representative's full name	Mandatory	Required to identity the user creating the account.
Client representative's email address	Mandatory	Required to uniquely identify and verify the user and contact the Client regarding the services.
Client's business address	Mandatory	For billing purposes.
Client representative's contact phone number	Optional	For contracting the Client regarding the services and for billing purposes.

Members:

Data Type	Mandatory / Optional	Reason for Collection
Member's full name	Mandatory	Required to identity the member creating the account.
Member's email address	Mandatory	Required to uniquely identify and verify the member.
Member's postcode	Mandatory	Required to create a journey
Member's address	Optional	Option to provide for further accuracy of journey matches
Member's phone number	Optional	Option to provide for further account profile details
Profile picture	Optional	Option to provide for further account profile details.
Geolocation tracking	Optional	Certain elements of our services and the Platform may use geolocation tracking, which you will need to expressly authorise within the Platform. This is entirely optional, but you may lose some functionality within the Platform if this is not enabled. You can turn the geolocation functions on or off within the Platform at any time at your discretion. Where you request us to make geolocation tracking available within the Platform, we will not share any location data with your employer.

Car Registration Number, Employee Number and Employer Name	Optional	We might ask for additional information if you are joining a specific employer community so that we can identify what employer community you are joining and you within the employer community.
--	----------	---

The above processing activity will also apply to 'pending members' who have been set-up by their employer in our systems, ready for them to complete the account set-up process.

You can choose not to give us your Personal Data, but this might impact how we provide our services to you. Sometimes, we're required by law or by our agreement with you to collect certain Personal Data. If you don't provide this information when we ask for it, we might not be able to fulfil our contract with you. In that situation, we might have to cancel the service you're using, but we'll let you know if that's necessary.

Platform and Website Users:

If you call or email us, we will usually collect your:

- name;
- email address; and
- telephone number.

This Personal Data is used to help you with any questions or requests you have. Usually this will be to identify your account in the Platform (if applicable) or to contact you with follow-up information.

When you visit our websites or use our Platform, we automatically collect:

- technical details like your IP address, browser type and version, time zone, browser plug-in types and versions, screen resolution, operating system and platform;
- information about your visit, such as which pages you visited, page interactions, page response times, download errors and how long you stayed; and
- details about the devices you use to access our services, like hardware models, operating systems and versions, software and mobile network information.

In relation to the Platform, we'll use your Personal Data to make your experience on our Platforms more effective and customised to you.

We use cookies on our website to recognise you from other users. This helps us give you a better experience when you're using our site and also allows us to make improvements. For more details, you can check out the Cookie settings on our website. Where you have opted in to the relevant cookies, we may track and record how you interact with our website including which pages you spend the most time on and which links you click.

If you don't want us to use your Personal Data in the manner detailed in this section, you can use your internet browser's "do not track" feature.

Marketing Communications:

If you are an existing Client or a Member, we may use the following types of Personal Data for sending marketing communications:

- name;
- email address;
- address; and
- telephone number.

If you have signed up to receive marketing emails from us (e.g. through our website or at in-person events), we will use your name and email address to send you marketing communications from time to time, based on your preferences. Each marketing email (excluding direct, personalised emails to you) will include a hyperlink for you to easily unsubscribe if you don't want to receive them anymore.

We may send you marketing materials in relation to our latest offers and services by post without receiving your consent (as this is based on our legitimate interests).

You have no obligation to give us your Personal Data for marketing purposes and you can opt-out at any time by [contacting us here](#) or changing your settings in the 'Account Settings' section of the Platform.

Information We Receive From Other Sources

We may also receive information from other sources, like third-party advertising networks and analytics providers. They give us general, anonymous data about you.

WHAT WE DO WITH YOUR PERSONAL DATA

Using Your Personal Data

We primarily use your Personal Data to provide the services that you have requested to you. This may include:

- making available the services within the Platform to you;
- you creating personalised travel plans that match your journey criteria;
- sending notifications and email updates (e.g. when someone responds to one of your journey postings (if you ask us to) or allowing members to email you directly in relation reply to your journey posts);
- enabling other members to post reviews related to their car sharing experiences with you (where applicable), whether positive or negative. We manage, monitor and remove these reviews as is appropriate to maintain our community of members;
- logging journeys within the Platform;
- providing trip authentication (where geolocation tracking is enabled);
- creating data and analytics (e.g. your estimated CO2e savings for certain journeys);
- sending emails about specific changes to the Platform or our services;
- to notify you of available or accumulated incentives and rewards; and
- keeping our site safe and running smoothly and for things like troubleshooting and research.

You can object to us using your Personal Data in certain situations:

- when we're using it for our legitimate interests. If you ask us to stop, we will unless we have a very good reason to continue.
- for marketing. If you ask us to stop, we will.

Sharing Your Personal Data

We may share your Personal Data as follows:

- where you are a member of a private and/or public network, we will share your profile details within the Platform with other members of that network only to increase your chances of connecting with members who are undertaking similar journeys to you;
- we share summary journey information on the public network with other travel planning websites and in our quick search tools;
- if you are part of an active employer community, we'll share relevant journey information with your employer to provide service metrics;
- we never share your email address, phone number, or location details with third parties like advertisers without your consent;
- we may also share your anonymous data with third-party analytics, email, and cloud storage providers to help improve our site;
- to prospective third party sellers and/or buyers if we sell or buy a business or assets, but only as much as necessary and in accordance with Data Protection Laws; and
- we may have to share your info to comply with any applicable laws.

Legal Ground for Processing

We will only process your Personal Data for as long as we have a relevant legal basis to do so. This is usually in order to provide you with the services you (or the organisation that you work for) have requested from Mobilityways ('contractual necessity'). We may also use 'consent' for marketing communications and we use 'legitimate interests' for marketing communications to existing Clients and members and for certain elements of the services.

If we have collected sensitive personal data as part of our service provision, we will always ensure that we either request explicit consent from you or document the appropriate exemption to allow the processing of this data.

We may only use your Personal Data for the reasons we collected it, unless we think we need to use it for another valid reason that's related to the original purpose. If we believe this new reason isn't compatible with the original purpose, we'll either assess the privacy impact or ask for your consent to continue processing. If you want to know how the processing for the new reason fits with the original one, please contact us for an explanation.

Storing Your Personal Data

The information we collect from you will be stored either in the UK, the European Economic Area (EEA) or any other country where we've ensured there are appropriate data transfer mechanisms in place. Your Personal Data is kept on our secure servers or those of our trusted subcontractors. Additionally, some of your Personal Data may be stored in an external customer relationship management system, which helps us track our communications and interactions with you.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow such third parties to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

Protecting Your Personal Data

We take our security obligations very seriously and constantly monitor for breaches and potential weaknesses. We are ISO27001 certified and we are committed to ensuring that data is stored, archived or disposed of in a safe and secure manner. We have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we collect.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

Retaining Your Personal Data

We'll only keep your Personal Data for as long as we need it to fulfil the purposes that we have collected it for. If you've signed up for an account on the Platform, we'll keep your Personal Data whilst you are a Member. This helps us assist you if you have any questions or issues with our services. You can delete your account anytime from your account settings within the Platform. We will permanently remove any corresponding Personal Data relating to you within a reasonable period following a request by email sent to operations@mobilityways.com. If you don't ask us to delete your Personal Data, after your membership ends, we'll keep your Personal Data (and other records from your account in the Platform) for a period of 24 months. We do this to help former Clients with any enquiries and to assist returning Clients in setting up their accounts again. Any other Personal Data we have about you will be anonymised and only used for general analysis of our services. Any Personal Data we're not required to keep or that can't be anonymised securely will be deleted.

WHAT ARE MY RIGHTS UNDER DATA PROTECTION LAWS?

You have various rights under the Data Protection Laws, which you can exercise by sending an email to operations@mobilityways.com.

Right of Access

You have the right to know if we're processing your Personal Data and to access a copy of that information.

Right to Object

You have the right to limit how we use your Personal Data in certain situations:

- if you believe we have incorrect Personal Data about you;
- if we no longer need your Personal Data, but you want us to keep it for legal reasons;
- if you ask us to stop handling your Personal Data for marketing purposes, we will stop; or
- if we're using your Personal Data based on our legitimate interests and you're objecting to this use. If you choose to limit our use of your Personal Data, we'll only use it with your agreement, except for storing it and handling legal matters.

Right of Rectification

You can ask us to correct any incorrect Personal Data that we have about you. If we're missing any details, you can provide us with the necessary information to complete your records.

Right to Data Portability

You have the right to receive a copy of your Personal Data in a format that can be easily read by a computer and to transfer it to another organisation that manages your Personal Data.

Right to Erasure

You have the right to ask us to delete your Personal Data in the following situations:

- we no longer need your Personal Data for the purposes we originally collected it for;
- you gave us consent to use your Personal Data, but you've withdrawn that consent;
- you object to how we're using your Personal Data, and we don't have a compelling reason to keep using it;
- our handling of your Personal Data has broken the law; or
- we're required by law to erase your Personal Data.

Right to Complain

You have the right to complain directly to us if you believe we have mishandled your Personal Data or failed to comply with the Data Protection Laws. We are committed to making this process accessible and transparent. To support this:

- you can submit a complaint by emailing operations@mobilityways.com
- We will acknowledge your complaint within 30 days of receiving your complaint;
- we will investigate and respond to your complaint without undue delay;
- we will keep you informed of the progress and outcome of your complaint; and
- if you are not satisfied with our response, you may escalate your complaint to the Information Commissioner's Office at <https://ico.org.uk/concerns> or by calling 0303 123 1113, although we would appreciate the opportunity to address your concerns first.
- You may be asked to complete a complaints form if further information is required

THIRD PARTY WEBSITE LINKS

The Platform may have some links to third party websites or services provided by our partners and affiliates. If you click on these links or use their services, you'll leave the Platform and you will be re-directed to the relevant third party site. This is solely at your risk and the third party websites will be governed by the relevant third party's terms and privacy policies, which we do not have any control over. Please check such terms and policies before you submit any Personal Data to a third party.

INFORMATION REGARDING CHILDREN

Our services are intended for people who are over 18 only and we therefore do not intentionally collect Personal Data relating to children. We will promptly delete any Personal Data relating to a child upon a written request from a parent or legal guardian.

CHANGES TO THIS PRIVACY POLICY

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or notification within the Platform.

ENQUIRIES

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to operations@mobilityways.com.

Last updated: July 2026