

PRIVACY AND COOKIES POLICY

1. INTRODUCTION.

- a. At Mobrage Limited (Hereinafter referred to as “Mobrage” “we” “our platform” and “us”), we are dedicated to the privacy of our application and website (“Jointly referred to as our “Platform”) visitors and users. We are committed to protecting and safeguarding your personal data. This privacy and cookies policy gives you an insight into how we collect and use your data to maximise your experience on our Platform. It shows how we collect, use, protect the information collected and your rights regarding your privacy. It also contains important information on who we are and how we use cookies on our website.
- b. The first time you visit our website or use our App, you will be informed about our use of cookies to improve your site experience. Consenting to our use of cookies in accordance with the terms of this Policy when you first visit our website permits us to use cookies every time you visit our website or use our App.
- c. By using this website or any of our services, you consent to the use of the cookies detailed herein and your personal data in the manner contained in this Policy, to the extent permitted by law. Please read this Policy carefully and note that the English version of this Policy is binding, all other translations are only for convenience purposes.
- d. Please note that if you are in the European Economic Area, United Kingdom, Switzerland or any other country that the EU General Data Protection Regulation 2016/679 (“GDPR”) and Data Protection Act of 2018 (DPA), you will not be required to consent to this Policy, however, by using Mobrage, you acknowledge that you have read and understood its terms. The provisions of 12 of this Policy apply to you specifically.
- e. This Policy should be read and used together with our [Terms of Service](#).

2. ABOUT US.

We are Mobraze Limited, a company registered in the United Kingdom. Mobraze is a digital marketplace for vehicle owners and vehicle experts. We aim to allow and help Vehicle Experts and Vehicle Users to locate one another quickly and efficiently. The Mobraze App lets Users quickly and timeously search for verified Vehicle Experts who can assist with Users' specific problem and narrow the search results down to within a 10-mile radius of where Users are.

We are based in London, United Kingdom. Regarding any issue related and connected to your privacy on our Platform, we can be contacted through info@mobraze.com or at our registered address, Mobraze Limited, 20-22 Wenlock Road London N1 7GU. We have a dedicated team who would endeavour to respond to your email timeously.

3. HOW WE COLLECT YOUR INFORMATION.

To maximise your experience on our website and application, we collect information in the following ways:

- a. When you provide them to us either by access, use or purchasing our services, registering for our Platform, request certain information from us or interact with us either online or offline in any manner whatsoever.
- b. We also passively collect information when you use our service. This collection of information can be from information in your browser or device.
- c. As you interact with any of our platforms, we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical information about you if you visit other websites or when you visit our sites and applications or use our applications on third-party sites or platforms using one or more devices that employs our cookies whether or not you are logged in or registered. To disable cookies, please refer to our cookies policy [here](#).

- d. In line with this Policy, Mobraze may use cookies to track user traffic patterns in order to create user's personalised/targeted services, offers, promotions, adverts, products, and capture trends, in accordance with our services. For safety and security purposes, service improvement, and data collection, we may use software that receives and records the Internet Protocol (IP) addresses of the computer's users used to interact/contact our Platform. We do not attempt to link these addresses with the identity of individuals visiting our Platform.
- e. We also collect information through analytics tools, including but not limited to Google Analytics, Alexa.com, etc.. This collection happens when you use any of our services or visit our platforms.
- f. We also use social media tools or third-party applications to collect information, especially when you join our Platform or use our services through these third party or social media platforms. To prevent us sharing your information with these third party platforms, please do not access our services through them. It is also advisable that you read the privacy policy of these third-party platforms to understand how your privacy is ensured by them.

4. INFORMATION WE COLLECT.

Through the mediums stated in 3, either from those provided to us by you, through third parties or through passive and automated means, we collect the following information from you.

- a. **Registration Information:** When you create an account or link your profile through a third party platform, We collect your contact or log-in details, which includes but are not limited to name, phone number, email address, zip/postcode, any other information you choose to share with us such as (bio, profile picture, etc.). On profile picture, this image may be shown as a thumbnail next to some of your activities on our Platform. Please note that this image is not frozen in time, rather it is of a dynamic nature. For example, If you change your image in 2023, it is the new image that will appear next to your activities from 2021, not that from 2021.

- b. Transaction Information: - This is collected when you contact us about a transaction on the Platform, or conduct any other transaction as offered on our Platform. The information that will be collected includes but are not limited to banking information, contact information such as your phone number, email address, mailing address, any other information you provide to us. Please note that in many cases, Mobrage cannot view or access all of the information you provide to us for compliance purposes, such as complete bank account numbers or payment information, as this may be transmitted in an automated manner directly to the vendor or party that requires that compliance information.
- c. Compliance and Verification Information: Information provided needed for compliance purposes as required for our services. These information might include your government ID and others as needed or required by law or for us to verify your suitability for the use of our Platform.
- d. Information about your visits to and use of our Platform, including the referral source, length of visit, page views, and website navigation paths.
- e. Location Information - These are information about your location provided by a mobile or other device interacting with our platforms, or associated with your IP address, where we are permitted by law to process this information. Location information, such as your live location, also helps us suggest Vehicle experts to Vehicle Users in their proximity.
- f. Information, such as your name and email address, that you enter in order to set up subscriptions to our emails and/or newsletters.
- g. Information that you post to our website with the intention of publishing it on the internet, which includes your username, profile pictures, and the content of your posts.
- h. Usage, viewing, technical, and device data when you visit our sites, use our applications on third-party sites or platforms, or open emails we send, including your browser or device type, unique device identifier, and IP address.

- i. Information contained in any communications that you send to us by email or through our website, including its communication content and metadata.
- j. Activity information about your use, and the use by any person(s) you authorise through your account, of our sites and applications, such as the content you view or post, how often you use our services, and your preferences.

Please note that the information we collect from you are categorised as follows: (a) identifiers (name, email address, IP address, location information, profile photographs); (b) commercial information (transaction data); (c) financial and transaction information (transaction details, payment details etc); (d) Internet and device information (browsing history; IP address, cookies, device details, browser information) (e) inference information about you; (f) legally-protected information (if you reveal gender or race in public forums by your own volition); (g) sensory information (if you call us, send an email or leave a voicemail); (h) usage Information (such as information about how you use our website(s), products, and services); (i) marketing and communications information (This is tied to your preferences in receiving marketing from third parties and us and your communication preferences); and (h) other information that identifies or can be reasonably linked to you.

We do not collect any special categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If you provide those information in our public forums or chats, we will protect it to the best of our ability, but please know that we will in no circumstance ask for these special category personal data information.

You are not required to provide personal data to us. It is within your right to decline any request to provide information to us. However, your failure to do so may affect our ability to provide the services you request. It might also limit the use of our Platform to its full potential. If you have an account with us, you may also review,

change or remove certain types of your information provided to us through your account settings.

5. HOW WE USE THE INFORMATION COLLECTED FROM YOU.

In line with regulatory provisions, applicable laws, your preferences as set on our Platform or third party platforms, we use information collected from you or related devices in the following manner or any other manner as stated on the relevant pages of our Platform:

- a. Administering, improving or promoting our services and ensuring that we maximise the potentials of our Platform and Services for your use.
- b. Personalising the use of our Platform as selected and set by you.
- c. Internal use by our staff and contractors to ensure the maximisation of your use of our platforms.
- d. Analysing data usage trends and preferences in order to improve the accuracy, effectiveness, security, usability or popularity of our Services.
- e. Communicating with you regarding a) marketing communications relating to our business or the businesses of carefully selected third parties which we think may be of interest to you (you can inform us at any time if you no longer require marketing communications either by clicking unsubscribe at the bottom of the email or contacting us in other ways provided); b) your account or transactions on our Platform; (c) send you KYC information or request feedback about features on our Platform; (d) notify you of changes to our policies; and (e) sending you non-marketing commercial communications such as dealing with inquiries and complaints made by or about you relating to our Platform or any other communication to us from you.
- f. Technical activities, such as bug detection and error reporting, etc.

- g. providing third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- h. verifying compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service); and
- i. Security, Fraud, and Legal Compliance, including to detect, investigate and prevent activities that may violate our policies or be illegal.
- j. If you are located in Europe, we process information as listed in this Policy as necessary (i) to fulfil our obligations under our contract with you or in order to take steps at your request prior to entering into a contract, or (ii) for our legitimate interest, such as to maintain our relationship with you or to protect you when you use our Platform.
- k. Your information for the purposes for which it was collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. We will notify you if we need to use your information for unrelated purposes and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURE OF INFORMATION COLLECTED FROM YOU.

Except as provided in this Policy, we will not provide your personal information to third parties. The way in which we may disclose information collected from you are:

- a. For compliance purposes like payment processing or identity verification.
- b. For legal purposes, which includes but are not limited to; complying with the requirements of the law such as subpoenas, search warrants, court orders, and

other legal processes; responding to enquiries or requests from government, regulatory, law enforcement, public authorities, or content protection organisations; defending the legal rights, privacy, safety or property of Mobrage, its subsidiaries, employees, agents, contractors or users; permitting Mobrage to pursue available remedies, commence, participate in or defend litigation, or limit the damages we may sustain; and to enforce this Policy or any applicable Terms of Service are complied with.

- c. To maximise our service to you, we might disclose to our partners and service providers which includes but are not limited to banks and payment providers, third-party identity checking or credit reference agencies, communication providers, analytics tools, IT, information security and cloud services providers, Vehicle Experts (if you are a Vehicle User). For Vehicle Users, we use your information to let Vehicle Experts contact you. For Vehicle Experts, we also use your information to present your Services to Vehicle Users.
- d. We may share your information with your consent, such as when you post personal information on platforms accessible to third parties, or you share your profile activities with third-party platforms.
- e. Please note that once we share your personal information with another company, the information received by the other company is controlled by that company and becomes subject to the other company's privacy practices.

7. SECURITY OF YOUR PERSONAL INFORMATION.

- a. We will take reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal information.
- b. We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

- c. All electronic financial transactions entered into through our Platform will be protected by encryption technology.
- d. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet, however, we undertake to take all reasonable steps to ensure the safety of your data. ,
- e. You are responsible for keeping the password you use for accessing our Platform confidential; we will not ask you for your password (except when you log in to our Platform).

8. YOUR RIGHTS AND CONTROLS ON YOUR INFORMATION.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are:

- a. **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.
- b. **The right to request correction of such personal data that we hold about you**: this enables you to have any incomplete or inaccurate data we hold about you corrected. However, we may need to verify the accuracy of the new information you provide to us.
- c. **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. If you delete your account, we will delete your data within seven days of such deletion.

- d. The right to 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.
- e. **The right to 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.
- f. **The right to 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. Please 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.
- g. The right to 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.

In ensuring that we address your requests:

- h. 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 such circumstances.
- i. 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.
- j. 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, requires additional efforts, or you have made several requests. In this case, we will notify you and keep you updated.
- k. For the purpose of this clause 8, legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

9. AMENDMENTS

We may update this Policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you understand any

changes to this Policy. We may notify you of changes to this Policy by email or through email or any other choice of communications as set by you.

10. CHILD PRIVACY.

Our Services are not designed for use by individuals under the age of 18, please do not use the Services and/or submit any information through the Services. If you have reason to believe that a child under the age of 18 has provided personal information to Mobrage through the Services, please contact us at info@mobrage.com, and we will delete that information from our databases to the extent required by law.

11. HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your personal data in an identifiable form for as long as we have a legitimate reason to use the data and as required by law.

12. GENERAL DATA PROTECTION REGULATION (“GDPR”) AND DATA PROTECTION ACT (DPA) PROVISIONS.

In addition to the clauses contained in this Policy, if you are a user in Europe, as directed by the GDPR, the following provisions apply to you. However, if you have doubts on whether the provisions in this (12) apply to you, please contact a legal practitioner for advice.

- a. Mobrage is a data controller under the provisions of the GDPR, and we are responsible for how your information is collected, used and disclosed, however, Vehicle Experts may also be data controllers of some data belonging to Vehicle Users if you are a Vehicle User and you contact a Vehicle Expert through any of our services. Please note that - the information collected by us is controlled by the terms of this Policy.
- b. Also be informed that if you provide information to us through any third-party platform, that third party platform may also collect your information separately. The information collected by any third parties is subject to the third-party’s privacy policy. Please note that the Privacy choices you have made on the third

party's Platform will not apply to our use of the information we have collected directly through our platforms.

- c. Also be informed that our Platform may contain links to third party websites, we are not responsible for the privacy practices of those sites. It is our advice to you that you please pay attention to the privacy policy of these third-party platforms.
- d. We only collect information to the extent needed and germane for the performance of our contract to you, provide services on our Platform and perform all the rights, obligations, responsibilities and terms contained in our Terms of Use.
- e. For the purpose of (d), "performance of contract" means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- f. We also collect information for our legitimate interest, on the basis of consent, to improve the quality of service provided to you, to respond to your questions, to provide marketing information to you, for legal reasons, to make and receive payment for the security of our Platform, to enforce our Term of Use, to engage in business change, to comply with a legal or regulatory obligation and to create anonymous data.
- g. For the purpose of (f), legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- h. For the purpose of (f), comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- i. Users in Europe have the right to opt-out of all of our processing of their data for direct marketing purposes, to do this you click “unsubscribe” at the bottom of a marketing email or edit your preferences in your account setting.
- j. Users in Europe also have the rights contained in 8 (a-g). In addition, they may also object to our uses or disclosures of personal data, to request a restriction on its processing, or withdraw any consent, though such actions typically will not have a retroactive effect. They also will not affect our ability to continue processing data in lawful ways (for example, if you opt-out of the use of your telephone number for direct marketing, we might still decide to contact you by phone regarding potential fraud on your account).
- k. Users in Europe or the United Kingdom also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. You also have the right to lodge a complaint with the supervisory authority of your residence, place of work or where the incident took place. However, we endeavour you to please contact us first at info@mobrage.com.
- l. We will only keep and retain the collected information as needed and pertinent for the collected data and as permitted by law. As soon as we no longer need to keep the data, we will remove it from our platforms and systems and take needed steps to anonymise it and make it undetectable to you.
- m. When we no longer need to use your information, we will remove it from our systems and records and/or take steps to anonymise it and take other steps to protect them. We regularly review our security procedures to consider appropriate protection methods. However, please be aware that despite our best efforts, no security measures are perfect or impenetrable.

- n. When determining the retention period, we take into account various criteria, such as the type of products and services requested by you or that you are provided with by us, the nature and length of our relationship with you, possible re-enrolment with our services, the impact on our Platform if we delete the information about you, mandatory retention periods provided by law and the statute of limitations.
- o. For any transfer, wherever your personal data is transferred, stored or processed by us, we will take steps to safeguard the privacy of your personal information, where the recipient provides appropriate safeguards, such as model contract clauses, binding corporate rules, or regulatory mechanisms like the EU-U.S. Privacy Shield framework. For any information on your privacy, any question and these regulations, you can reach us at info@mobrage.com.

COOKIES

13. WHAT ARE COOKIES?

- a. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

14. OUR COOKIES CATEGORIES AND WHAT THEY DO

- a. **Analytical** – We use analytical/performance cookies to help us understand how users engage with our website. An example is counting the number of visitors and seeing how many visitors move around our Platform when they are using it. This helps us to improve the way our website works, for example, ensuring that users, such as yourself, find what you are looking for easily.
- b. **Performance** – These cookies are necessary to enable the basic features of this site to function, some of these features include but are not limited to providing secure log-in or remembering your search history. These cookies are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- c. **Functional** – These cookies allow us to analyse your use of Namsû when you return to our website, this helps us to evaluate and improve our system performance. We use cookies to improve your experience by remembering your preferences, so we know how you like to use our website. Examples of this would be remembering you so that you are served with the same content, to remember you when you come back to the site or to remember that you like logging in via Facebook or other social media sites, your choice of language or region.
- d. **Social media convenience:** Social media cookies allow you to connect with social media platforms to share your Bottom Line Impact activities with these social media platforms. However, please note that using these social media platforms is subject to the provisions of our privacy policy.
- e. **Advertising and Marketing** – To ensure that the adverts and marketing campaigns that you see are relevant to you we use cookies to collect information about the types of things that interest you, for example, websites you visit and the geography that you are based in. Having these cookies does not increase the number of adverts you will be shown, but simply makes the adverts you see more relevant to your internet activities.

- f. **Targeting activities**– Targeting cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- g. **Third-Party Cookies** - We use the following third-party services for analytics, advertising and marketing. We suggest that you take a look at the privacy and data policies of these platforms to help you know how they use your data. These platforms include but are not limited to Alexa.com; Google Analytics; Google AdSense.
- h. We do not respond to “Do Not Track” signals that can be activated on certain browsers.

15. **MANAGING YOUR COOKIES PREFERENCES**

- a. The length of time that a cookie remains on your computer or mobile device depends on whether it is a “persistent” or “session” cookie. Session cookies last until you stop browsing and persistent cookies last until they expire or are deleted.
- b. You can always manage your cookies and tracking. You can do this through the settings in your browser. You can set your browser to inform you on accepting or rejecting cookies on a website you visit. If you use different devices in different locations to access our Platform, you should make sure that these devices are set to your preferences before accessing our Platform.
- c. If you have previously consented to us storing cookies on your machine but then change your mind, you can delete the cookies from your browser or device. Most browsers also allow you to prevent all or some cookies being stored on your machine in the future. For adequate and accurate information on how to delete or disable cookies from your browser, please use the “help” function within your browser. For more information on how to modify your browser settings or how to block, manage or filter cookies can be found in your browser’s help file or through such sites as www.allaboutcookies.org.
- d. If you only want to reject some or all of the third-party cookies, you will need to visit the relevant third party’s website directly to manage cookies stored on your machine by them.

- e. Please be informed that disabling cookies may affect the functionality and accessibility of some pages on our Platform.
- f. We can't always control third party cookies stored on your machine from our Application and website, setting your cookie preferences with us will not stop those third-party cookies from being stored on your machine. You must manage these cookies directly with the relevant third party. We suggest that you take a look at the privacy and data policies of these third parties to help you know how they use your data.
- g. Additionally, please note that blocking cookies may not completely prevent how we share information with third parties such as our advertising partners. To exercise your rights or opt-out of certain uses of your information by these parties, please follow the instructions in the "Behavioural Advertising" section (section 9) above.
- h. For further information about cookies, please visit the guidance on cookies published by the UK Information Commissioner's Office at <https://ico.org.uk/your-data-matters/online/cookies/>
- i. You can withdraw any consent to the use of cookies or manage any other cookie preferences (except for performance or necessary cookies, which are always active) by amending your choices via the "cookies settings" located on the footer of our Website.

16 CONTACTING US.

Please do not hesitate to contact us if you have any questions regarding Mobrage's Policy or our attitude to the protection of your information. You can reach us on info@mobrage.com or 20-22 Wenlock Road London N1 7GU

17 HOW TO COMPLAIN

Please contact us if you have any queries or concerns about our use of your information (see section 16). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- the Information Commissioner, in the UK, and

- a relevant data protection supervisory authority in the state of your habitual residence, place of work.

The UK's Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.