

# Data Privacy Notice

For drivers participating in our Data Collection Programme

5th March 2025

## 1. Scope

This Data Privacy Notice applies to drivers who participate in ELM Mobility Ltd's Data Collection Programme. It explains what data we collect, how we use it, and your rights regarding your personal data. If you are a logistics business providing operational data, a separate privacy notice will apply.

## 2. Who We Are

ELM Mobility is a start-up vehicle manufacturer committed to creating the worlds first ground-up, fit-for-purpose last mile delivery platform. Our vision is to be the leader in zero-emission last mile transport, delivering game-changing efficiency with small, lightweight vehicles.

## 3. What Data We Collect

We collect telemetry data from delivery vehicles like yours to help us understand the nuances of last-mile delivery duty cycles in real-world conditions. The telemetry data we collect includes:

- **GPS Time & Location Data** (to understand logistics patterns)
- **GPS Speed & Heading Data** (to understand route efficiency)
- **Accelerometer Data** (to understand driving styles)

We do not collect personal identifiers such as your name, phone number, or driver's license details. However, because we collect location data, we are obligated to treat it with the same level of care as personal data.

We may also combine telemetry with data from other sources, including but not limited to:

- **Road & Traffic Data** (to analyse the impact of congestion)
- **Weather Data** (to analyse the impact of road conditions)
- **Postcode Data** (to correlate GPS locations to delivery addresses)
- **Logistics Data** (to analyse operational efficiency)

#### 4. Why We Collect This Data

We collect this data with the purpose of:

- Design and development of better delivery vehicles.
- Building an understanding of specific duty cycles.
- Enhancing vehicle efficiency and performance.

We collect this data **based on your consent**, which you can **withdraw at any time**.

#### 5. What We Use Your Data For

We use your data for research and development purposes, specifically to:

- Segment real-world last mile delivery duty cycles.
- Enhance our vehicle design, efficiency and performance.
- Understand driving conditions and optimise future vehicle capabilities
- Compare the performance of new vehicle designs with existing delivery vehicles.

#### 6. How We Process Your Data

We use a number of both manual and automated techniques to process your data. We endeavour to **anonymise and aggregate data wherever possible** to protect individual privacy.

#### 7. How Long We Keep Your Data

We retain telemetry data for **up to three years** before anonymising or securely deleting it.

If you withdraw your consent, we will endeavour to delete your data within 30 days.

## 8. Who We Share Your Data With

ELM Mobility is considered the **Data Controller** under GDPR law requiring us to limit access to your data only to groups contributing to our stated purpose. These groups may include:

- Internal research and development teams.
- **Trusted commercial partners** supporting us in vehicle design and engineering.
- **Trusted research institutes** supporting us in vehicle duty cycle modelling.
- **Participating delivery companies** who may access limited data for their fleet's operations.

However:

- **We do not** share data that identifies individual drivers.
- **We do not** share data or metrics for driver performance evaluation purposes.

## 9. How We Protect Your Data

Your data is always encrypted to prevent unauthorised access as it transits from point of collection, through to processing and storage. All data is stored using secure cloud storage with limited and continuously reviewed access control.

## 10. Compliance with Data Protection Laws

We comply with all applicable data protection laws, including the General Data Protection Regulation (GDPR). This means we:

- Process your data lawfully, fairly, and transparently.
- Only collect data necessary for our stated purposes.
- Take appropriate measures to protect your data from unauthorized access or misuse.
- Allow you to exercise your rights under GDPR, such as accessing or deleting your data.

## 11. Your Rights

Under **GDPR** data protection law, you have a number of rights:

- **Right to Access** - You have the right to receive a legible copy of your personally identifiable information held about you.
- **Right to Rectification** - You have the right to request the update of personally identifiable information held about you.
- **Right to be Forgotten** - You have the right to request erasure ('deletion') personally identifiable elements of data from our systems. We do retain the right to remember that we've been asked to forget you.
- **Right to Object to Processing** - You have the right to object to the processing of your personally identifiable information, under certain conditions.
- **Right to Revoke Consent** - You have the right to change your mind at any point by revoking consent to this Data Privacy Policy.

## 12. Exercising Your Rights

To exercise your rights, you must submit a written request to **hello@elmmobility.com**

Upon appropriately validating your identity, your request will be actioned within 30 days.

## 13. Actioning Your Request

We do not record or associate individual drivers with any collected data. Therefore, to exercise your rights, we may request additional details such as dates and vehicle registration numbers to be able to correctly identify which subset/s of data require action.

Please note that data that has already been anonymized and aggregated cannot be linked back to individual drivers and does not fall under GDPR deletion rights.

## 14. Important Things to Know

We collect data for **the purpose of research and development** only.

We use telemetry data to **track vehicles, not people**.

**We do not** associate individual drivers with any collected data.

**We do not** use any data to track individual drivers or their personal movements.

We endeavour to **anonymise any data** that could be used to infer personal information.

**We never sell** or share telemetry data with third parties for marketing or advertising.

We only collect data from your vehicle on the basis of your **explicit consent**.

You have the **right to revoke your consent** at any time.

## 15. How to Contact Us

If you have any questions or concerns about this Privacy Notice, please reach out to us:

- Email: **hello@elmmobility.com**
- Web: **<https://www.elmmobility.com/data-collection-programme>**

## 16. Participation

By participating in this program, you acknowledge that you have read and understood this Privacy Notice. Thank you for helping us build the future of sustainable delivery vehicles!