

Brompton Bicycle Group Consumer Privacy Policy

1. Which Brompton companies are covered by this policy?

Brompton is made up of different legal entities, details of which can be found below. For the purposes of this privacy policy, Brompton Bicycle LTD is the principal data controller. This privacy policy is also issued on behalf of the Brompton Group so when we mention ("Brompton"), "we", "us" or "our" in this privacy policy, we are referring to Brompton Bicycle LTD and the relevant company in the Brompton Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us.

The following Brompton companies are also covered by this policy:

Name	Primary Operating Location	Registered Office	Website	Description
Brompton France SARL	France	3 Boulevard de Sébastopol, 75001 Paris, France	https://fr.brompton.com	Brompton Junction in France
Brompton Benelux	Netherlands	Reestraat 14 H, 1016DN Amsterdam, Netherlands	https://nl.brompton.com/	Brompton Junction in Netherlands
Brompton Bicycle Inc	United States	55 Washington Street, Ste 253A, Brooklyn, NY 11201	https://us.brompton.com/	Distributor of Brompton in the United States.
Brompton Bicycle LTD	United Kingdom	Unit 1, Greenford Park, Ockham Drive, Greenford, Middlesex, UB6 0FD	https://www.brompton.com/	Ultimate parent of all group companies. Manufacture of Brompton Bicycles. Distributor to UK and EU markets
Brompton Bicycle Retail Limited	United Kingdom	Unit 1, Greenford Park, Ockham Drive, Greenford, Middlesex, UB6 0FD	https://www.brompton.com/	Brompton Junction in the UK and E-Commerce in the UK and EU.
Brompton Bicycle Singapore Pte Ltd	Singapore	107 North Bridge Road, #01-26 Funan Mall, Singapore 179105	https://sg.brompton.com/	Brompton Junction and E-Commerce in Singapore
Brompton Bike Hire Limited	United Kingdom	Unit 1, Greenford Park, Ockham Drive, Greenford, Middlesex, UB6 0FD	https://bromptonhire.com/	Bike Hire rental business in the UK

Brompton Deutschland GmbH	Germany	Pestalozzistr. 44 35606 Solms, Hessen, Germany	https://de.brompton.com/	Brompton Junction in Germany
Brompton Japan K.K.	Japan	Tokyo Club Building 11F, 3-2-6 Kasumigaseki, Chiyoda-ku, Tokyo	https://jp.brompton.com/	Distributor of Brompton in Japan

Brompton is committed to respecting your privacy rights and recognises the importance of protecting your personal information.

This privacy policy aims to give you information on how Brompton collects and processes your personal data including through your use of our websites, our Apps (Brompton Electric or Brompton Bike Hire) or purchase one our products in store.

This Privacy Policy was last updated on 20th November 2023. We may update this Privacy Policy from time to time, the up-to-date version will always be available on the Websites, but we will also tell you about any important changes.

2. The data we collect about 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, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, nationality, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you, order information and other details of products and services you have purchased from us.
- **Product Data** includes details about the Brompton products you hold or that you have registered with us such as warranty details, parts, serial numbers, maintenance.
- **Technical Data** includes internet protocol (IP) address, operating system, your login data, unique device ID, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our websites, products and services or visit our stores.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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 fail to provide personal data

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 (for example, to provide you with goods or services). 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.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - register and create an account on our websites or register your warranty;
 - make an enquiry about our Websites or Apps, our products, services or the status of your order;
 - request marketing to be sent to you;
 - register a product with us;
 - submit information via any surveys or review we invite you to participate in;
 - participate in one of our promotions and/or attend one of our events or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our websites, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://www.brompton.com/legal/cookies> for further details.
- We will receive personal data about you from various third parties as set out below:
 - Contact, Product and Transaction Data when you buy a product in one of our stores or with a dealer. The store or dealer will register your purchase via our secure web portal on your behalf.
 - Technical Data from the following parties:
 - (i) analytics providers [such as Google based outside the UK];
 - (ii) advertising networks [such as [NAME] based [inside OR outside] the UK]; and
 - (iii) search information providers [such as [NAME] based [inside OR outside] the UK].
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as [NAME] based [inside OR outside] the UK].
 - Identity and Contact Data from data brokers or aggregators [such as [NAME] based [inside OR outside] the UK].

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

5. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer including: (a) User account creation (b) Account administration and management (c) Bike registration	Identity Contact Product	Performance of a contract with you
To manage and administer the following: (a) Bike subscriptions (b) Bike loans and trials (c) Bike rental and hire (d) Test rides	Identity Contact Financial Product	Performance of a contract with you
To process and deliver your order including: (a) Processing payments and managing fees and charges (b) In store orders (c) Collecting and recovering money owed to us	Identity Contact Financial Transaction	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study

(c) Providing customer services (d) Analysis of feedback and satisfaction		how customers use our products/services)
To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Contact Product Profile Usage Marketing and Communications Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our websites, products/services, marketing, customer relationships and experiences including: (a) Managing ebike diagnostics (b) Analysing customer behaviour	Technical Usage Product	Performance of a contract with you Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical Product Usage Profile Marketing and Communications	Consent Necessary for our legitimate interests (to develop our products/services and grow our business)
CCTV Security and monitoring in store	Identity Usage	Necessary for our legitimate interests (to detect and prevent crime and for health and safety purposes)
To enable you to partake in a prize draw, competition or complete a survey	Identity Contact Profile Usage Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

<p>To register you to attend one of our events or to attend one of our promotions.</p> <p>To administer or manage our events or promotions including feedback, reviews, answers to promotion questions, photos, videos or other user generated content</p>	<p>Identity</p> <p>Contact</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to measure success of events, to develop future events and grow our business)</p>
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CCTV in store

Technologies associated with our CCTV systems will be used for the purpose of collecting non-identifiable analytical data e.g., to understand how many customers visit our stores, analyse the socio-demographics of our customers or to improve store layout. You cannot be identified by the use of these technologies.

6. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Product, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products from us and you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us via email to support@brompton.co.uk.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, warranty registration, product experience or other transactions.

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you 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.

7. Who we share your Information with

We may share your information with the following categories of recipients:

- to **Brompton Group companies or our third party service providers and third party partners** who provide data processing services to us for any of the purposes explained above (for example, to host our Websites and Apps or manage our events), or who otherwise process personal information for purposes that are described in this Privacy Policy or who were otherwise notified to you when we collect your personal information.
- Our service providers are all located globally and fall within the following categories:
 - customer support service providers;
 - product support, including diagnostics, service providers;
 - marketing service providers;
 - advertising partners;
 - website hosting and maintenance service providers;
 - product review service providers;
 - customer analytics providers;
 - product or service fulfilment providers;
 - payment service providers and acquirers;
 - event management service providers.
 - to **any law enforcement agency, court, regulator, government authority or other third party** where we believe this is necessary to comply with a legal or regulatory obligation, to protect, exercise or defend our rights or the rights of any third party, or otherwise to protect the vital interests of any person;
 - to an **actual or potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy; and
 - to any other person with your consent to disclose.

Klarna

In order to be able to offer you Klarna's payment options, we will pass to Klarna certain aspects of your personal information, such as contact and order details, in order for Klarna to assess whether you qualify for their payment options and to tailor the payment options for you. General information on Klarna you can find [here](#). Your personal data is handled in accordance with applicable data protection law and in accordance with the information in [Klarna's privacy policy](#).

8. Security

We want you to feel confident about using our Websites and Apps and we are committed to protecting the information that we collect. We have appropriate technical and organisational measures in place to protect the information you provide to us against unauthorised or unlawful use and against accidental loss, damage or destruction. 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 are subject to a duty of confidentiality.

9. How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Brompton Bicycle customers – we will retain your personal data for the period of any warranty or extended warranty you hold with us. We will continue to process your data throughout this period and 3 years after the expiry of the warranty in accordance with this policy.

10. Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. It is Brompton's policy to respect your rights and Brompton will act promptly and in accordance with any applicable law, rule or regulation relating to the processing of your personal data.

Details of your rights are set out below:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "Contact" heading below.
- In addition, you can **object** to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "**Contact**" heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "**Contact**" heading below.
- Similarly, if we have collected and process your personal information with your consent, then **you can withdraw your consent at any time**. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority, in the UK this is Information Commissioner's Office (www.ico.org.uk).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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 could 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 could 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.

US rights

For details on do not sell rights in the US, please check here <https://us.brompton.com/legal/do-not-sell-my-personal-information>.

11. International Transfers

From time to time, we, our group companies, service providers and/or third party partners may need to transfer your information internationally in order to service our websites or in connection with any other purpose explained in this Privacy Policy. This may include transfers of your personal information to territories outside of the UK and European Economic Area (or EEA). These countries may have data protection laws that are different to the laws of your country and in some cases may not be as protective.

Specifically, our servers are located in the United Kingdom and Ireland, our third party service providers and partners operate across Europe and the United States and our group companies operate around the world including in Asia, Australia, New Zealand and the United States. This means that when we collect your personal information, we may process it in any of these countries.

Whenever we transfer your personal data, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK or EEA which give personal data the same protection it has in the UK or EEA.

12. Other Websites

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

13. Contact

If you have any questions about this Privacy Policy, about the ways in which we process your information or would like to exercise one of your rights you can contact us at: support@brompton.co.uk.

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