

Privacy Notice

Please ensure this Privacy Notice has been shared with the people whose data you provide to us and all named parties and that they are satisfied that they understand it.

1. Who we are

We are committed to protecting your privacy. This Privacy Notice explains how (i) Ford Motor Company Limited; and (ii) Ford-Werke GmbH, including FCE Bank Plc as agent on behalf of such entities (“**we**”, “**us**” or “**our**”), will collect, use and disclose personal data about you.

In this Privacy Notice, ‘you’ includes any existing or prospective person or entity that is currently, or applies to be, as applicable: (i) an importer or distributor of our products; (ii) a converter purchasing our products for modification, conversion, or adaptation; or (iii) a guarantor, as well as relevant individuals connected with the ownership, management and/or representation of such businesses.

For the purposes of applicable data protection law, personal data or personal information is data, or a combination of pieces of data, that could reasonably allow you to be identified.

2. Information we collect

We collect personal data about you from a variety of sources, both from you directly (including when assessing you as a prospect and entering into agreements with us) and from your company or employer; and from third parties such as our subsidiaries, associated companies or parent companies (“**Group**”); our service providers, who may for example perform relevant background, regulatory, due diligence, compliance or screening checks; our agents; your law firms; as well as from publicly available sources, such as publicly accessible registers of companies, directors or businesses.

We may be required by law or contract to collect certain personal data about you, or as a consequence of our relationship with you or your company or employer. Failure to provide this personal data may prevent or impair our ability to perform contracts entered into with you or your company or employer.

The categories of information that we collect depends on the circumstances and the nature of our relationship or interaction with you or your employer, including where we are assessing prospects and determining whether to enter into a business relationship with you or your employer at a pre-contractual stage, and/or subsequently throughout the lifecycle of our relationship with you or your employer. This includes:

- (i) personal contact details (including full name and address).
- (ii) business contact details (including business email and address).
- (iii) date of birth and country of birth.
- (iv) information collected, used or generated in connection with identity verification documents (such as passports, ID cards, driving licences or equivalent documents), and sanctions, know your customer (KYC), anti-money laundering (AML), politically exposed person (PEP), fraud and crime prevention, adverse media, enforcements, and other relevant background, compliance, regulatory or due diligence checks, where permitted or required by applicable law.
- (v) financial data.
- (vi) other strategic or confidential information relating to your business.

(vii) information relating to your business's ownership structure.

3. How we will use your personal data and our lawful grounds

The purposes for which we use your personal data, and the legal basis under applicable data protection laws on which we rely to do this, are primarily the following:

(i) Performance of the contract, including where necessary to:

- a. verify your identity, credentials and suitability to enter into a business relationship with you or your employer.
- b. conduct onboarding activities.
- c. administer or reconcile your payments and process orders and invoices.
- d. monitor ongoing performance and compliance with obligations under agreements entered into with us.
- e. manage your enquiries and requests and provide support.
- f. exercise our rights or enforce our remedies under agreements entered into with you.

(ii) To meet our legitimate interests, including to:

- a. perform financial analysis, underwriting, due diligence and risk management activities, including to assess your creditworthiness, financial condition, suitability (including to provide credit support), credit exposure and identifying credit-related risks, to determine whether to enter into a business relationship with you or your employer.
- b. evaluate whether to offer particular payment terms.
- c. conduct onboarding activities.
- d. establish, onboard and manage business relationships with you or your employer, including communicating with you or your employer.
- e. conduct KYC, sanctions and restricted party screening, fraud and crime prevention, adverse media, enforcements, and other relevant background screening and other due diligence, regulatory or compliance checks where necessary to assess prospective and ongoing business relationships, manage risk, protect our business and in accordance with internal policies and procedures.
- f. manage related financial and operational risk and prevent fraud or misuse.
- g. manage arrangements and relationships with our service providers, insurers, professional advisers, auditors, and other relevant third parties.
- h. ensure the integrity, security and resilience of our systems, business processes and operations.
- i. maintain appropriate books, records and accounts.
- j. protect the rights, privacy, safety and property of us and our employees and contractors.

(iii) To comply with legal and regulatory obligations, including as applicable to:

- a. conduct due diligence, KYC, AML, sanctions, PEP, fraud and crime prevention and other compliance, regulatory or background checks required by applicable law or regulation.
- b. comply with legal and regulatory obligations to which we are subject, and cooperate with regulators, governmental authorities and law enforcement bodies.

(iv) To obtain your consent, where required by applicable law.

4. Who we share your personal data with

Your personal data may be disclosed to:

- (i) members of our Group, their and/or our suppliers, advisors, contractors, and others who provide services to us or our Group, as required for the purposes set out above.
- (ii) banks, professional advisers, or lawyers.
- (iii) credit and fraud reference agencies.
- (iv) insurance and reinsurance companies.
- (v) service providers, including organisations that provide us with business support services (for example, back-up and server hosting, IT software and maintenance platforms) or perform or enable background, screening, regulatory, due diligence or compliance checks.
- (vi) if required by law, government authorities or agencies, or pursuant to a court order, or any other third party.
- (vii) legal and regulatory bodies.
- (viii) law enforcement agencies and other regulated bodies for the purposes of investigating or preventing crime.

5. How long we keep your personal data

We will retain your personal data for as long as necessary for the purposes described in this Privacy Notice and in line with company policies, including to ensure performance of obligations under agreements entered into with us, compliance with legal and regulatory obligations, conduct risk management, and the establishment, exercise or defence of legal claims.

6. How we protect your personal data

We implement technical and organisational measures designed to ensure a level of security appropriate to the risk to the personal data we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal data. We evaluate these measures on a regular basis to maintain the security of the processing.

7. International data transfers

The personal data that we hold about you may be transferred to our Group or to third parties located outside the UK or the European Economic Area, including the United States. We will put in place measures to protect your data, in accordance with applicable law, and subject to appropriate safeguards (e.g. contractual commitments such as approved Standard Contractual Clauses) and the UK International Data Transfer Agreement.

8. Your rights

You have certain rights in relation to the personal data we hold about you, subject to local law. A summary of your rights is set out below:

- (i) Access to your personal data.
- (ii) Object to certain types of processing.
- (iii) Have your personal data rectified or corrected if it is inaccurate or incomplete.
- (iv) Request the deletion or removal of your personal data.
- (v) Request to restrict (i.e. block or suppress) our use of your personal data.
- (vi) Receive your personal data in a structured, commonly used electronic format and transmit it to a third party (data portability).

You can exercise your rights by contacting us at dpeurope@ford.com. You are responsible for making sure that you provide us with accurate and up to date information and we encourage you to contact us to update or correct your data if it changes or if the personal data we hold about you is inaccurate.

9. How to contact us

If you have any questions or concerns about the use of your personal data, you may contact the Data Protection Officer at dpeurope@ford.com. You have a right to complain directly to us about the processing of your personal data, by contacting us at dpeurope@ford.com. If we cannot resolve a complaint to your satisfaction, you also have the right to lodge a complaint with a data protection supervisory authority, as appropriate.

10. Changes to this privacy notice

We may modify this Privacy Notice and notify you of any material changes from time to time.