



BENTLEY

THE BENTLEY NETWORK

PRIVACY POLICY

Date Last Modified: September 28th, 2016

Bentley Motors Limited («we»,»us») is a company registered in England and Wales (Company Registration Number 0992897), Pym's Lane, Crewe, Cheshire, CW1 3PL.

Welcome to the Bentley Network mobile application and related services (collectively "the App"). This policy outlines:

- The types of information we may collect or that you may provide when you download, install, register with, access, or use the App; and
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

You should read this policy before using the App so that you can understand our practices regarding your information and how we will treat it. By downloading, installing, registering with, or using the App, you expressly consent to our collection and use of your information as described in this policy. If you do not agree with our policies and practices, do not download, install, register with, or use the App.

Here at Bentley we value your privacy and your desire to know how your information will be handled and used. We are committed to protecting that information. To better protect your privacy, we provide this Privacy Policy, which explains our information practices in relation to the App and your use of that App.

I. **THE INFORMATION WE COLLECT AND HOW WE COLLECT IT**

We collect information about you and your use of the App in a few ways. First, we collect information that you voluntarily provide to us, which you may do either through your registration for and use of the App, and information that you may provide when you email or otherwise contact us. In addition, our technology automatically collects certain information in connection with your use of the App. We describe each of these types of information in further detail below.

A. INFORMATION YOU PROVIDE TO US

When you register with or use the App, we may ask you to provide certain information by which you may be personally identified, such as your name, email address, postal mailing address, home/mobile telephone number, Vehicle Identification Number, and geo-location information (this type of information is referred to as "Personal Information"). We will collect this type of information about you when you provide it to us, such as when you submit information in connection registering to use the App and setting up an account, and when you email us with questions. We might also ask you for information when you enter a contest or promotion sponsored by us, or when you report a problem with the App. You are in control of providing this type information to us, and you are responsible for ensuring that it is accurate (including by providing updates as necessary).

B. INFORMATION THAT YOU POST

The App is an interactive community platform that allows our members to display and publish information, photos, and links on areas of the App that are visible to other members of the Bentley Network. We refer to these postings as "User Contributions". It is your decision whether to display and publish any User Contributions, and you understand that doing so is at your own risk. Although you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of third parties with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by or shared with unauthorised persons.

C. LOCATION

The App includes services that allow us to geotrack the device on which the App is installed (the "Device") and monitor its real-time location, which will include our access of your GPS positioning as indicated by the Device's GPS features ("Location Information"). You may be able to opt in to the App's collection of Location Information by modifying your Device's location settings. Opt out however, will cause any location-based features of the App to be disabled.

D. AUTOMATIC INFORMATION COLLECTION

When you download, access, and use the App, it may use technology to automatically collect:

- ♦ **Usage Details.** We may automatically collect certain details of your access to and use of the App, including traffic data, location information, and other communication data and the resource that you access and use on or through the App.
- ♦ **Device Information.** We may collect information about your Device and internet connection, including the Device's unique device identifier, operating system, browser type, and mobile network information.
- ♦ **Stored Information and Files.** The App may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.

We refer to this type of information as "**Usage Information**".

E. THIRD PARTY INFORMATION COLLECTION

When you use the App, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include analytics companies, your mobile Device manufacturer, your mobile service providers, and third-party hosts of information collected through the App.

These third parties may use tracking technologies to collect information about you when you use this App. The information that they collect may be associated with your personal information, or they may collect information, including Personal Information, about your online activities over time and across different applications and other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about any targeted content you receive, you should contact the responsible provider.

2.

HOW WE USE THE INFORMATION THAT WE COLLECT

We use information that you provide to us, or that we collect about you, including any Personal Information and Location Information, to:

- Provide you with the App and its contents, and to enable you to use the App for its intended purpose as a mobile network that shares certain information among members;
- Give you notices and otherwise communicate with you about your membership;
- Notify you when App updates are available, and of any changes to any products or services that we offer or provide through the App;
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us (including the End User License Agreement and Terms and Conditions); and
- Fulfil any other purpose for which you provide it (including answering your enquiries).

We use the Usage Information that we collect internally to understand and analyse usage trends and preferences, to improve the way the App functions and looks, and to create new features and functions. We also use this information to remember your information so that you will not have to re-enter it during subsequent uses of the App.

If you have indicated a wish to receive marketing or advertising information it is possible that we will use your information to contact you about our own and third parties' goods and services that may be of interest to you. You may change your preferences regarding such material at any time by contacting privacy@bentley-network.com.

3.

DISCLOSURE AND SHARING OF YOUR INFORMATION

A. PROFILE INFORMATION AND USER CONTRIBUTIONS

Members of the Bentley Network are required to set up an App profile, which is visible to all other members of the Bentley Network (but is not visible to the general public outside of the App). Your App profile will display your nickname, which will consist of your first name and the first initial of your last name (for example, John Doe will appear to other members as "John D." Your public profile will also include other information that you choose to include as a part of your profile, including photos (of yourself and/or your Bentley(s)), your job, and your interests. If you have opted in to location based services your public profile will include your location information.

All of your User Contributions will also appear on the App, and will be visible to all other members of the Bentley Network.

We cannot control how other members of the Bentley Network will use or share any information that you choose to include in your App profile or that you submit as a User Contribution. The disclosure of information such as photos, your location, your job and your interests is not mandatory and is entirely within your control. You should only share this information if you are comfortable that it will be seen, and potentially used, by other members of the Bentley Network.

B. SHARING INFORMATION TO PROVIDE THE SERVICES

To enable us to more efficiently operate the App, we may share Personal Information, Location Information, and certain other information collected through the App with our affiliates and with selected third parties who are acting on our behalf as our agents, suppliers or other service providers. By subscribing for the App, you have given your consent to us to collect and share the information you provide as necessary for us to provide services in connection with the App.

Except as described above, we will not share your Personal Information with any other party without your express consent.

C. SHARING OF USAGE INFORMATION WITH OTHERS

We may provide aggregate Usage Information (to the extent it does not include any Personal Information), and other information collected through the App that cannot be used to personally identify you, to third parties on an anonymous basis. This information may also be combined with information from third parties (including other users of the App) collected by us or third parties, and disclosed to third parties on an aggregate basis. We also may disclose Usage Information and other aggregate non-personally-identifiable information with interested third parties to assist such parties in understanding the usage, viewing, and demographic patterns for certain programs, content, services, advertisements, promotions, and/or functionality.

D. LEGALLY REQUIRED DISCLOSURE

We may also disclose any information if required to do so by law or in the good-faith belief that such action is necessary to comply with any applicable laws or to respond to a court order, judicial or other government subpoena, or warrant. In some cases, we may make such disclosures without first providing notice to you. We also reserve the right to disclose any information that we believe, in good faith, is appropriate or necessary to take precautions against liability; protect us or other users from fraudulent, abusive, or unlawful uses; to investigate and defend ourselves against any third-party claims or allegations; to assist government enforcement agencies; to protect the security or integrity of the App and its users; or to protect the rights, property, or personal safety of us, users of the App (including you), or others.

4.

YOUR CHOICES REGARDING YOUR INFORMATION

We strive to provide you with choices regarding the Personal Information you provide to us. Some of this information is required in order for you to use the App, such as your real first and last name, your Vehicle Identification Number, your email address, and your location. If you do not want us to collect, access, use and share this information, you should not install or use the App. By installing and using the App, you consent to all uses of your information as described in this notice.

You can choose whether to allow the App to collect and use real-time information about your Device's location through the Device's settings. However, blocking tracking technology and location information may result in portions of the App being inaccessible or not functioning properly.

If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, or if you do not want us to share information with unaffiliated or non-agent third parties for advertising and marketing purposes, you can opt out at any time by notifying us at privacy@bentley-network.com.

You may update, correct, or delete your subscription information and preferences at any time by emailing us at community-manager@bentley-network.com. To protect your privacy and security, we take reasonable steps to verify your identity before granting you access to your account or making corrections to your information. **PLEASE NOTE THAT YOU ARE RESPONSIBLE FOR MAINTAINING THE SECRECY OF YOUR UNIQUE PASSWORD AND ACCOUNT INFORMATION AT ALL TIMES.**

5.

OUR COMMITMENT TO DATA SECURITY

We use commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your information and prevent unauthorized access, use, alteration, and disclosure. We cannot, however, ensure or warrant the security of any information you transmit to us, and you do so at your own risk. Once we receive your transmission of information, we make commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

The safety and security of your information also depends on you. You are responsible for keeping your profile password, and you should not share this password with anyone. In addition, you should be careful about giving out information in areas of the App that are visible to other members of the Bentley Network, because information that you share in these areas may be viewed and used by any other user of the App.

If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice through the App or its associated website if a security breach occurs. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive a free written notice of a security breach you should notify us at security@bentley-network.com.

6.

OUR COMMITMENT TO CHILDREN'S PRIVACY

Bentley does not knowingly collect information from visitors under the age of 16. In the event that we learn that we have collected information from a child under age 16 without verification of parental consent, we will delete that information. If you believe that we are holding information on children under 16 please contact us at privacy@bentley-network.com.

7.

WHERE WE STORE YOUR PERSONAL DATA

This Privacy Policy has been prepared for users of the App who are located in the UK and EU. If you access this App from outside those areas you should be aware that country may have laws governing data collection and use that differ from the UK and EU law applicable on this App. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area («EEA»). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers.

8.

DATA PROTECTION LEGISLATION

All information we collect about you will be used and protected by us in accordance with current UK data protection law and this Privacy Policy. For the purpose of this Privacy Notice and the Data Protection Act 1998 (the Act), the Data Controller is Bentley Motors Limited of Pyms Lane, Crewe, Cheshire, CW1 3PL.

9.

COOKIES

We use standard technology called 'cookies' on this site. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. We need this information to identify you and to store information about the products you select between visits. This helps us to improve our service to you. Although most browsers automatically accept cookies you can usually change your browser to prevent cookies being stored. If you do turn cookies off, however, this will limit the service that we are able to provide to you. For further information please refer to our cookie policy.

10.

ACCESS TO PERSONAL DATA AND YOUR RIGHTS

We wish to keep your personal information up to date. Please contact us at privacy@bentley-network.com to advise of any changes such as change of address or telephone number. In order to change your preferences or to access information held about you please contact us using the contact details above.

11.

CHANGES TO OUR PRIVACY POLICY

Because of changes in internet technology and practice, this privacy policy, and our security and other policies, may change from time to time. Changes will be reflected by updating the “last modified” date included within this notice. In general, we only use your personal information in the manner described in the privacy policy in effect when we received that personal information. Your continued use of the App constitutes your agreement to this privacy policy and any future revisions. For revisions to this privacy policy that may be materially less restrictive on our use or disclosure of personal information you have provided to us, we will make reasonable efforts to notify you and obtain your consent before implementing such revisions with respect to such information.

12.

IN THE EVENT OF MERGER OR SALE

In the event that Bentley Motors Limited is acquired by or merged with a third-party entity, we reserve the right, in any of these circumstances, to transfer or assign the information that we have collected from users of the App as part of such merger, acquisition, sale, or other change of control.

13.

OUR CONTACT INFORMATION

Because of changes in internet technology and practice, this privacy policy, and our security and other policies, may change from time to time. Changes will be reflected by updating the “last modified” date included within this notice. In general, we only use your personal information in the manner described in the privacy policy in effect when we received that personal information. Your continued use of the App constitutes your agreement to this privacy policy and any future revisions.

For revisions to this privacy policy that may be materially less restrictive on our use or disclosure of personal information you have provided to us, we will notify you and obtain your consent before implementing such revisions with respect to such information.

Please contact us with any questions or comments about this privacy policy, your personal information, our third-party disclosure practices, or your consent choices in relation to the Bentley Network at: privacy@bentley-network.com

If you wish to contact us with any questions regarding Bentley Motors Limited please contact Bentley Motors LTD, Pyms Lane, Crewe, Cheshire, CW1 3PL. Tel: 0808 100 5200