

Shell Privacy Policy

This is the Privacy Policy for the **Mobile Motorist application**. This Privacy Policy provides information on the processing of your personal data as a result of being (i) one of our customers, (ii) a member of the Shell Bonus Card (Loyalty Program), (iii) a visitor to the Loyalty Program website and/or (iv) a user of the Mobile Motorist application by Shell Hong Kong Limited or one of its affiliates (**Shell**).

This Privacy Policy may be changed over time. You are advised to regularly review the Privacy Policy for possible changes. This Privacy Policy was last changed on **12.01.2015**.

Special Notice – age restriction

This App is intended for motorists only and should not be used by anyone who is not legally entitled to drive. If you are not legally entitled to drive please do not use this App and / or send us your personal data (for example your name, age, address or email address).

1. When is this Privacy Policy applicable?

This Privacy Policy provides information on the processing of your personal data as a result of being (i) one of our customers, (ii) a member of the Loyalty Program, (iii) a visitor to the Shell Hong Kong website (**Website**) and/or (iv) a user of the Mobile Motorist App (**App**).

In the App you may find a number of links to other websites or applications. Although these websites or applications are selected with care, we are not responsible for the processing of your personal data through these websites or applications. This Privacy Policy is therefore not applicable to the use of such websites or applications.

2. Who is the controller of your data?

Shell Hong Kong Limited, a company registered in Hong Kong whose registered office is at 35/F., AIA Kowloon Tower, Landmark East, 100 How Ming Street, Kwun Tong, Kowloon, Hong Kong, is the controller for the processing of your personal data.

3. For what purpose do we process your personal data?

In this Privacy Policy we describe what personal data we process and for what purposes.

3.1 Customer service and relationship management

What does this purpose entail?

If you contact our Customer Service Centre with a question or a complaint, we may ask you for certain information to identify yourself and to help us respond to your enquiry. We use any personal data supplied only for this purpose and to improve our customer support services.

Which personal data do we process for this purpose?

To be able to respond appropriately to your question or complaint, we note details of your question or complaint in our customer database. We may also ask you for contact details in order to keep you informed about your question or complaint. If you have a question or complaint relating to your participation in our Loyalty Program (e.g. your account balance, gift deliveries), we may also ask for additional personal details to confirm your identity.

3.2 Participate in promotions

What does this purpose entail?

Shell regularly runs promotions for its customers. In some cases we may ask you to provide us with your personal data through a registration form, advertisement or website in order to participate in the promotion.

Which personal data do we process for this purpose?

If you choose to participate in such promotions, we may process the personal data provided by you (including your name, age, address and e-mail address) in order to register or confirm your participation, to determine whether you fulfill the promotion conditions and to send you any prizes or benefits. Depending on the promotion we may also process information on your participation in the promotion, such as scores, submissions or prizes/benefits won.

3.3 Development and improvement of products and services

What does this purpose entail?

Shell regularly conducts market research with its customers through the use of surveys. We use your responses to such surveys for quality assessments and to improve your customer experience.

Which personal data do we process for this purpose?

If you choose to participate in our surveys, we may process the personal data provided by you (including your name, age, address and e-mail address).

3.4 General Offers

What does this purpose entail?

As a customer of Shell or a member of our Loyalty Program, you may receive general offers and information from Shell ("**General Offers**").

With General Offers, we would like to notify you of Shell products, events and promotions that may be of interest to you. Such General Offers may include but are not limited to the issue of:

- electronic newsletters with offers and general information;
- bonus Loyalty Program points in respect of qualifying purchases;
- Shell fuel or shopping vouchers;
- discount coupons for Shell shop products.

You may receive your General Offers by regular mail, email, SMS, through the Loyalty Program Website, App (through push notifications), social media, coupons or any other digital channels used by you. If you are a Loyalty customer you may adjust your Contact Preferences & Account Settings at any time via the Loyalty Program Website.

Which personal data do we process for this purpose?

For sending you General Offers, we may process the personal data provided by you (including your name, age, address and e-mail address).

Opting out of General Offers

You can at any time stop receiving General Offers by opting out via the App Settings. We will delete or render anonymous any personal data that is no longer needed to serve you with General Offers.

3.5 Personalised Offers

What does this purpose entail?

As a customer of Shell or a member of our Loyalty Program, you may receive offers from Shell that are tailored towards your personal preferences based on analyzing your purchase history, your participation in promotions, surveys, the Loyalty Program and your use of Websites, Apps and other digital channels (“**Personalised Offers**”).

With Personalised Offers, we would like to notify you of Shell products, events and promotions that we believe may be of interest to you. Such Personalised Offers may include but are not limited to the issue of:

- bonus Loyalty Program points in respect of qualifying purchases;
- Shell fuel or shopping vouchers;
- discount coupons for Shell shop products.

You may receive your Personalised Offers by regular mail, email, SMS, through the Loyalty Program Website, App (through push notifications), social media, coupons or any other digital channels used by you. If you are a Loyalty customer you may adjust your Contact Preferences & Account Settings at any time via the Loyalty Program Website.

Which personal data do we process for this purpose?

In order to be able to provide you with Personalised Offers, Shell needs to understand your preferences. In order to be able to determine your preferences, Shell may analyse:

- Your purchase history;

This includes data regarding (i) specific products you buy, (ii) the total amount of your purchases per transaction, (iii) the time and place of the purchases you make and (iv) the payment method you use.

- How you choose to redeem your awarded points;

This includes data regarding (i) the type and description of the award you have chosen, (ii) the quantities of awards you have chosen, (iii) the amount of points you have redeemed, (iv) the frequency and time of redemption of your points and (v) delivery method used to deliver your award (if any).

- If, how and where you redeem offers (including coupons);
- Your use of the Website, App and e-mails you receive from us

This includes data regarding (i) the links you click on the Website, (ii) the number of times you login to your online Loyalty Program account, (iii) your location based on your IP-address, (iv) how you respond to or engage with e-mails sent by us, and (v) how you use the App (including your location as obtained through our App if this is something that you have previously consented to).

- Your participation in promotions
- Your responses to surveys

In order to determine your preferences, Shell may also combine your personal data already known by affiliates of Shell including your use of:

- the Loyalty Program;
- Websites, App, coupons, social media, survey's, promotions and other digital channels;
- Shell branded fuel cards and other payment cards at Shell retail sites, along with purchases of customers with similar interests and supplemental socio-demographic information about you from third party sources in order to analyse your previous purchases.

Opting out of Personalised Offers

You can at any time stop receiving Personalised Offers by opting out via the App Settings. We will in such case stop analysing your personal data and purchasing habits, and delete or render anonymous any personal data that is no longer needed to serve you with Personalised Offers.

3.6 Administering our Loyalty Program

What does this purpose entail?

We process your personal data in order to administer your participation in our Loyalty Program.

Which personal data do we process for this purpose?

We may process any or all of the personal data provided by you during your enrollment in the Loyalty Program, such as your name, age, address and e-mail address.

Opting out of the Loyalty Program

You can choose to discontinue your participation in the Loyalty Program entirely at any time by contacting Shell at cardctr@shell.com. We will then delete or render anonymous any personal data you provided to us when you enrolled for the Loyalty Program.

3.7 Technical and functional management of the Website and App

What does this purpose entail?

When you visit or use the Website or App, we process some technical information about you (such as your IP address) to provide you the functionalities of our online services and to manage them. With this technical information we are able to manage the Website and Apps, for example to resolve technical failures or to improve their reliability.

Which personal data do we process for this purpose?

We process technical data such as the IP address of your computer, tablet or smartphone, details of the pages you have visited on the Website or App, the web browser you use to surf, previous/subsequent sites that you have visited and the length of your visit/session.

3.8 The generation of management information and statistical data

What does this purpose entail?

Shell performs research into market trends through statistical analysis. We use the results of such research to evaluate our current products and services and to adapt our products, marketing and service stations to new developments. The research results are only reported on an aggregate basis.

3.9 Preventing, detecting and investigating fraud

What does this purpose entail?

Shell may use the personal data you provide Shell to prevent, detect and investigate fraud and to enforce its Terms and Conditions.

3.10 Feedback and forum facilities

If at any time this App offers any feedback and/or forum facilities (or similar), Shell may collect the information that you disclose in using such facilities. Such information will be used in accordance with this Privacy Policy. Please note that Shell cannot be held responsible for other parties' use of the personal data which you make available to such

third parties through any feedback or forum facilities in this application. Please be careful about what personal data you disclose in this way.

4. Who has access to your data?

Shell may disclose your personal data to any of the following:

- Authorized third party companies involved in the operation of the Loyalty Program, such as any other company that is permitted to supply products and/or services to Loyalty Program members;
- Any agents, service providers and/or subcontractors of Shell and its affiliates;
- Any person to whom Shell proposes to transfer any of its rights and/or duties.

Shell uses third parties for certain processings, such as website hosting. The collected personal data may be transferred to authorized third parties, which may be located outside of the Economic European Area (**EEA**) as part of the services offered to you. By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA or one of our service providers is located in a country outside of the EEA. As far as these third parties have access to personal data in order to execute these processings, Shell has taken the required organizational and/or contractual measures to ensure that your personal data is exclusively processed for the purposes mentioned above and that adequate levels of protection have been implemented in order to safeguard your personal data.

Except as set out in this Privacy Policy, we will not disclose any personal data without your permission unless we are legally entitled or required to do so or if we believe that such action is necessary to protect and/or defend our rights, property or personal safety and those of our users/customers or other individuals. Only if Shell is required to do so by law, will your personal data be provided to supervisory agencies, fiscal authorities and investigative agencies.

5. For what period do we retain your personal data?

Upon your request to discontinue your participation in the Loyalty Program or by deleting the App we will close the applicable accounts as soon as reasonably possible. We will also close or deactivate inactive customer accounts and close accounts that are used in violation of this Privacy Policy or applicable Terms and Conditions. Personal data from closed or deactivated accounts will be deleted or rendered anonymous as soon as is reasonably possible. Under certain circumstances we will retain personal data from closed or deactivated accounts for longer, such circumstances being the prevention of fraud or to otherwise take actions permitted or required by law.

6. Which cookies does Shell use?

The Website and/or App uses cookies or similar technology. A cookie is a small text file that is sent to your internet browser so that we are able to recognise your browser when you return. Shell and its authorised service providers may use small graphic images known as 'clear GIFs' that work in conjunction with cookies to identify you and your use of the Website and/or App. Shell and such service providers may also use other technologies to store information in your browser utilising local shared objects or local storage, such as HTML 5 cookies, flash cookies and other web application software methods.

Using these technologies we can collect data on the use of the Website and/or App such as which pages are visited, your interaction with information on the Website and the duration of your visit.

Functional cookies – Shell stores cookies that are essential in providing the functionalities of the Website and/or App. For instance, the cookies remember your preferences, such as language and region, which remain as your default settings when you revisit the Website and/or App. However, should you wish to do so, you can choose to reject or block the cookies set by Shell by changing your browser settings – see the Help function within your browser for further details.

Web analytics cookies – Shell may use third party cookies for web analysis. Such cookies allow Shell to analyze the usage of the Website and/or App. This relies on aggregated statistical data that Shell's authorised service providers provide Shell and allows Shell to understand the way you use the Website and/or App. Shell and such service providers may only provide such data to third parties if this is required by law.

Advertising cookies – Shell may use third party cookies for advertising purposes. Shell may use authorised service providers to serve advertising on the Website and/or App and other websites on the internet. Such service providers may place cookies on your browser, and may collect information that helps them identify your device, such as IP-address, or other unique or device identifiers.

Shell does not retain a cookie longer than necessary. We use session cookies and permanent cookies:

- A session cookie can track usage such as the webpages you visit and what options you use. When you close the internet browser, the session is ended and the cookie is deleted.
- A permanent cookie enables the Website and/or App to recognize you at a subsequent visit. It remains on your system until you delete it.

Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual.

Note, however, that if you reject the use of cookies you will still be able to visit our websites but some of the functions may not work correctly and you may no longer be able to use all the functionalities of the Website and/or App.

7. If you communicate with us through social media

Sharing our Website or content through social media

If you choose to share our Website, App or content through social media such as LinkedIn, Facebook and/or Twitter, your personal data (such as your name and the fact that you are interested in Shell) will also be visible to all the visitors of your personal webpage on LinkedIn, Facebook and/or Twitter. On the use of such social media websites only the terms and conditions (including the privacy policy) of the social media website apply. Shell is not responsible for the processing of personal data or the privacy policy of such social media websites, and Shell's Privacy Policy is therefore not applicable.

Our Facebook page

We have a Facebook page. When you communicate with us through our Facebook page (for example, when you post a comment, upload media, send a personal message or become a fan of us by clicking the "Like" button, we may receive personal data about you (such as your (user) name, profile photo, your hometown, your email address and your gender). How we use your personal data, is described in the applicable Facebook Privacy Policy, which applies in addition to (i) this Privacy Policy and (ii) the terms of use and other statements from Facebook. Shell encourages you to carefully read the terms of use and other statements of Facebook. Such terms of use and other statements may differ from this Privacy Policy.

8. How do we secure your personal data?

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use.

9. Who to address regarding questions and requests of access, removal etc.

We aim to keep our data about you as accurate as possible. If you would like to review, change or delete the details you have supplied to us, please email SITI-MLM-Support@shell.com.