

Motor Fuel Group - Privacy Policy

1. Introduction

Motor Fuel Limited ("**we**", "**us**", and "**our**") is the Controller for the Personal Data described in this Privacy Policy.

As part of our everyday business operations, we use Personal Data relating to our current, former and prospective employees, our customers, users of our website, our subscribers, and other stakeholders. This Privacy Policy explains how we collect, access and use that Personal Data.

We work with other parties to help operate our business, including subsidiary companies within Motor Fuel Limited, including Roberts Garages Limited (the "**Group**") and the contract managers we appoint to run our forecourt stations ("**Contract Managers**"). Subsidiaries form part of the Group, while Contract Managers are external parties who are not part of the Group nor employees of the Group who may operate as sole traders or other separate legal entities.

These parties are separate legal entities and may act as independent Controllers for the Personal Data they use.

We reserve the right in our sole discretion to amend this Privacy Policy from time to time. In this event, we will post the revised policy on our website. Please check back frequently to see any updates or changes to this Privacy Policy.

If you have any questions about this Privacy Policy or our handling of your Personal Data, please contact us at customer@motorfuelgroup.com.

2. Privacy Policy

In this Privacy Policy:

- "**Controller**" means an entity that determines the purpose (i.e. the "why"), and the means (i.e. the "how") of how the Personal Data is being used;
- "**Data Protection Laws**" means any data protection laws applicable to us, including the UK General Data Protection Regulation, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003, the Data (Use and Access) Act 2025, Data Protection (Jersey) Law 2018 and Data Protection Authority (Jersey) Law 2018;
- "**Personal Data**" means any information that can be used to identify or potentially identify you. This can include your name, contact details, date of birth and CCTV footage;
- "**Processing, Process, or Processed**" means anything we do with your Personal Data, such as collecting it, storing it, using it, sharing it, or deleting it. For simplicity, this Privacy Policy will refer to "using" the Personal Data to cover all forms of Processing.
- "**Special Category Data**" means any Personal Data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data (if used for the purposes of uniquely identifying an individual), health data and data relating to an individual's sex life or sexual orientation. In the context of this Privacy Policy, it will also cover data relating to criminal convictions and offences.

2.1. What Personal Data We Use and How We Collect It

This section describes the Personal Data which we use and how we collect this during our everyday business operations.

Type of Personal Data	Description	Source
Identity Data	Name, title, date of birth, contact details, bank details, customer identifiers, employment identifiers and, where appropriate, any other personal or business information used to verify your identify, understand your background and monitor risk over time.	Provided directly by you (e.g. job applicants, employees, customers); obtained via contract documentation; collected during interactions at our fuel stations.
Contact Data	Postal address, email address, telephone number, emergency contact details.	Provided directly by you, via online forms, customer enquiries, employee onboarding information.
Recruitment Data	CVs and other information in connection with a job application or application to be a Contract Manager: This may include details of your career, references, date of birth. Right to Work documentation (such as passports, visas or immigration status documents), where required for employment purposes.	This information will be provided by you when you complete the online application form on our website.
CCTV Footage & Related Data	Images of individuals; vehicle number plates and vehicle information (make/model/colour); timestamps and metadata.	CCTV systems operated by us; CCTV footage accessible from Contract Managers; derived metadata such as timestamps and camera location.
Website Data	IP address, device identifiers, login information, browsing behaviour, cookies, activity on our websites.	Automatically collected through website analytics tools, cookies, and online forms submitted by you.
Subscription & Marketing Data	Preferences, subscription details, optin/optout records, marketing engagement data.	Provided directly by you via website forms, email interactions and marketing analytics.

2.2. Why We Use Personal Data and Our Lawful Basis

The following table sets out the purposes for which we use your Personal Data in connection with our everyday business operations. We only use your Personal Data to the extent that it is necessary to fulfil the relevant purpose. Under Data Protection Laws, we are also required to have a "lawful basis" to use your Personal Data.

This is summarised in the table below.

Purposes of Processing	Categories of Personal Data	Lawful basis
Recruitment activities, including assessing applications, contacting applicants, and making hiring decisions.	<ul style="list-style-type: none"> ○ Identity Data ○ Contact Data. 	<ul style="list-style-type: none"> ○ To take steps at your request to enter a contract with you, and for the ongoing performance, management and facilitation of such contract. ○ To comply with our legal obligations. ○ To pursue our legitimate interests in managing an effective recruitment process.
Managing our relationship with employees, workers, and contractors, including HR administration, payroll, performance management and compliance.	<ul style="list-style-type: none"> ○ Identity Data ○ Contact Data. 	<ul style="list-style-type: none"> ○ To perform, manage and facilitate our contractual relationship with you. ○ To comply with legal obligations (including employment and tax requirements). ○ To pursue our legitimate interests in administering our workforce efficiently.
Providing products and services to customers, and responding to enquiries, complaints and incidents at our sites.	<ul style="list-style-type: none"> ○ Identity Data ○ Contact Data ○ CCTV Footage & Related Data. 	<ul style="list-style-type: none"> ○ To perform and facilitate our contractual relationship with you. ○ To pursue our legitimate interests in delivering customer services, managing enquiries and handling incidents at our fuel stations.
Providing access to EV charging services and the MFG Connect App, and supporting customers with account queries, charging sessions, payments and technical issues.	Please see our separate EV Charging Privacy Policy on the MFG Connect App.	Please see our separate EV Charging Privacy Policy on the MFG Connect App.

Fuel station safety, security and crime prevention, including investigating incidents.	<ul style="list-style-type: none"> ○ CCTV Footage & Related Data. 	<ul style="list-style-type: none"> ○ To pursue our legitimate interests in protecting our staff, customers and property. ○ To comply with legal obligations (including obliging with licensing conditions and assisting law enforcement). ○ For the establishment, exercise or defence of legal claims.
Operating and improving our websites and digital services, including monitoring usage, troubleshooting, and ensuring security.	<ul style="list-style-type: none"> ○ Website & Online Usage Data ○ Identity Data, where applicable. 	<ul style="list-style-type: none"> ○ To pursue our legitimate interests in ensuring the functionality, security and improvement of our website.
Marketing and communication activities, including sending updates, offers or promotions where permitted.	<ul style="list-style-type: none"> ○ Subscription & Marketing Data ○ Contact Data. 	<ul style="list-style-type: none"> ○ We obtain your explicit consent where required under Data Protection Laws, including for optional activities such as marketing. Where we rely on consent, we provide clear and accessible information about how your Personal Data will be used. You may withdraw your consent at any time (by opting out online). We do not collect personal data relating to individuals under the age of 18. ○ To pursue our legitimate interests in communicating with existing customers and promoting our services where permitted.
Compliance with legal and regulatory obligations, including responding to requests from authorities and maintaining required records.	<ul style="list-style-type: none"> ○ Identity Data ○ Contact Data ○ CCTV Footage & Related Data. 	<ul style="list-style-type: none"> ○ To comply with our legal obligations.
Protecting our legal rights, managing disputes	<ul style="list-style-type: none"> ○ Any category of Personal Data relevant to the issue. 	<ul style="list-style-type: none"> ○ To pursue our legitimate interests in protecting, enforcing and defending our legal rights.

We rely on legitimate interests to use some of your Personal Data. Before doing this, we carry out a balancing test to make sure that our interests do not override your rights or freedoms. We only use your information when it is genuinely necessary for the purpose, and when you could reasonably expect us to use it in this way.

If you would like more information about this balancing test, please contact us at customer@motorfuelgroup.com.

2.3. Sharing your Personal Data

We may share Personal Data with suppliers who provide services to us under a contract, such as IT hosting providers, payment system providers and other technology and operational service providers etc. These suppliers support the operation of our fuel stations, including keeping our till software, point-of-sale systems and payment processing platforms running securely and providing operational, maintenance, safety and security services across our fuel stations.

When we use third-party suppliers, we only share the minimum Personal Data needed for them to provide the service. Each supplier must use the Personal Data only for the agreed purpose and must delete it when the service is completed.

We will only disclose your Personal Data to:

- companies within our Group and other Contract Managers;
- our professional advisers and auditors (including tax, legal or other corporate advisers who provide professional services to us);
- our regulators, law enforcement or fraudprevention agencies, as well as our legal advisers, courts, the police and any other authorised bodies, for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters;
- HMRC or other tax bodies or agencies to comply with our legal and regulatory obligations;
- prospective buyers or sellers in the event that we consider selling or purchasing any business or assets;
- insolvency practitioners in the event we are subject to any insolvency process (e.g. administration or liquidation);
- other companies and organisations (including HMRC, the local police or other local lawenforcement agencies) for the purposes of staff and customer safety, crime prevention; and
- any person or body where we are under a legal or regulatory duty to disclose or share your Personal Data, including for the prevention or detection of fraud or crime, such as in response to a court order or to help prevent fraud or other criminal activity at our fuel stations.

2.4. Use of CCTV

CCTV is used at MFG fuel stations for safety, security and incident-management purposes. The fuel stations are operated by Contract Managers, who operate CCTV at their sites for these same purposes and act as independent controllers in respect of the CCTV footage they collect.

CCTV helps protect our fuel stations, prevent and detect crime, and support the investigation of accidents and incidents. This CCTV may capture images of you while you are on or near our premises.

If you are identifiable in our CCTV footage, you have the right to request access to it (as outlined in section entitled "**Your Rights**"). When we receive a request, we will review the footage and either provide a copy or arrange for you to view it, unless an exemption applies (for example, where disclosure would prejudice the detection of crime or reveal Personal Data about someone else).

Where footage contains other individuals, we may need to redact or pixelate their images, seek their consent, or assess whether it is reasonable to disclose the footage without affecting their privacy. If we cannot disclose the footage for legal or privacy reasons, we will explain why.

Requests for CCTV footage should be directed to customercare@motorfuelgroup.com.

2.5. International Transfers

We do not routinely transfer your Personal Data outside the UK and/or Bailiwick of Jersey (**Jersey**), and we contractually prohibit any third-party organisations with whom we share your Personal Data from doing so. Where a transfer outside of the UK and/or Jersey is unavoidable, we will ensure appropriate safeguards that provide an adequate (or equivalent) level of protection for your Personal Data are in place as required under Data Protection Laws, such as the UK and/or Jersey International Data Transfer Agreement or the UK and/or Jersey Addendum to the EU Standard Contractual Clauses.

We will also carry out an appropriate assessment of the laws and practices of the destination country to identify any technical and organisational measures that may be required to ensure that your Personal Data remains fully protected in that country.

If you would like more information about our safeguards, please contact us at customercare@motorfuelgroup.com.

2.6. Information Security

We take the security of your Personal Data seriously. We use a combination of technical and organisational measures intended to reduce the risk of loss, misuse, unauthorised access, disclosure or alteration. Where appropriate, these may include secure systems, access controls and monitoring measures to help keep your Personal Data safe.

If you have any questions about the security of your Personal Data, please contact us at customercare@motorfuelgroup.com.

2.7. Cookies

Our website uses first-party cookies and similar technologies to ensure the website functions properly, improve usability and enhance your browsing experience. These **Strictly Necessary Cookies** are essential for core features to operate and are always active. They are small data files stored on your device and relate only to you and this website. By continuing to browse our website, you consent to these cookies being stored on your device.

In addition to these essential cookies, we also work with thirdparty partners who provide analytics and advertising services. Through these partners, we use **Performance Cookies** that help us understand how visitors use our website, and **Targeting Cookies** that support advertising, measure the effectiveness of those adverts and deliver relevant content across the internet. These technologies may collect information about how you interact with our website and other websites or applications.

Performance Cookies and **Targeting Cookies** are optional and will only be set if you choose to enable them using the controls in the "Manage Privacy Preferences" panel. You can update your preferences at any time, and your choices will apply unless you later clear your cookies or change your browser settings. If you choose not to allow these optional cookies, we will not place them on your device, although this may mean certain analytics functions or personalised advertising will not operate.

For full details of the cookies we use, including their purposes and source, please see the table below.

Cookie Name	Purpose	Type
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_ga	Google Analytics cookie used to collect online identifiers (e.g., cookie identifiers, IP addresses, device identifiers, client identifiers). Enhances understanding of website usage.	Performance
_gid	Google Tag Manager / Google Analytics cookie capturing online identifiers including cookie IDs, IP addresses, device IDs, client identifiers.	Performance
_gat	Used to limit the number of requests sent to Google's servers (ratelimiting). Does not store user information.	Performance
Wfvf	Session cookie storing general geographic information (e.g., timezone). Automatically deleted when you leave the website.	Performance
wordfence_verifiedHuman	Cookie set by Wordfence Security (WordPress plugin) to distinguish genuine users from malicious bots and protect the website.	Strictly Necessary

2.8. Retention of Your Personal Data

We retain your Personal Data in line with our data retention policies and for as long as it is relevant or necessary to our ongoing contact with you, or until you update your information.

Where we have not specified a fixed retention period, we retain Personal Data based on factors such as legal requirements, the nature of our relationship with you, and operational needs. This includes considering the type of Personal Data, the risk of harm from any continued storage, and our need to retain certain information to protect our legal rights, resolve disputes, maintain accurate business records, and ensure the proper functioning of our operations.

2.9. Privacy by Design

We apply the principle of *privacy by design* to all new or significantly changed systems that collect or use Personal Data. This means we consider privacy risks from the outset and ensure that appropriate safeguards are built into our processes. Where required, we complete a Data Protection Impact Assessment ("**DPIA**") to assess and document the privacy implications of the proposed Processing.

A DPIA will typically consider:

- how Personal Data will be collected, used, stored and shared, and for what purposes;
- whether that use is necessary and proportionate;
- the risks to individuals arising from that use; and
- the controls needed to mitigate those risks and demonstrate compliance with Data Protection Laws.

We also consider techniques such as data minimisation and pseudonymisation where these are appropriate and effective.

2.10. Your Rights

You have several legal rights in relation to the Personal Data that we Process about you, which can be exercised at any time by contacting customercare@motorfuelgroup.com. These rights apply unless an exemption under Data Protection Laws applies. If an exemption does apply, we will explain to you when responding to your request.

We will aim to respond to any request you make in relation to your rights within one month, or 4 weeks in the case of Jersey. If your request is particularly complex, we may extend this by a further two months, or 6 weeks in the case of Jersey. We will inform you if this is the case.

Right	Description
To be informed	<p>A right to be informed about the Personal Data we hold about you. This Privacy Policy sets out how we collect, hold and store your Personal Data, what we do with it and why.</p> <p>If you have any questions, please contact us at customercare@motorfuelgroup.com so we can provide you with the further information you require.</p>
Of access	A right to access the Personal Data we hold about you.
To rectification	A right to require us to rectify any inaccurate or incomplete Personal Data we hold about you.
To erasure	<p>A right to ask us to delete the Personal Data we hold about you.</p> <p>This right will only apply where:</p> <ul style="list-style-type: none"> • we no longer need to use the Personal Data to achieve the purpose we collected it for; • where you withdraw your consent if we are using your Personal Data based on your consent; or <p>where you object to the way we use your Personal Data.</p>
To restrict Processing	<p>In certain circumstances, a right to restrict our use of the Personal Data we hold about you.</p> <p>This right will only apply where:</p> <ul style="list-style-type: none"> • you dispute the accuracy of the Personal Data held by us; • where you would have the right to ask us to delete the Personal Data but would prefer that our use is restricted instead; or <p>where we no longer need to use the Personal Data to achieve the purpose we collected it for, but you need the Personal Data for the purposes of establishing, exercising or defending legal claims.</p>
To data portability	<p>In certain circumstances, a right to receive the Personal Data you have given us, in a structured, commonly used and machine-readable format.</p> <p>You also have the right to require us to transfer this Personal Data to another organisation, at your request.</p>
To object (general)	A right to object to our use of the Personal Data we hold about you where our lawful basis is for the purpose of our legitimate interests, unless we are able to demonstrate, on balance, compelling legitimate grounds for continuing to Process the Personal Data which override your rights or which are for the establishment, exercise or defence of legal claims.

To object (direct marketing)	An absolute right to object to our use of the Personal Data we hold about you for direct marketing purposes.
In relation to automated decision-making and profiling	A right for you not to be subject to a decision based solely on automated Processing, including profiling, which produces legal effects concerning you or similarly significantly affect you. Note that our Processing does not involve automated decision-making.
To withdraw consent	A right to withdraw your consent, where we are relying on it to Process your Personal Data (for example, to provide you with marketing communications). To withdraw your consent please contact customercare@motorfuelgroup.com . Please note that if you withdraw your consent, this will not affect any Processing carried out before the withdrawal was received.
A right to complain	A right to complain to us if you have any queries, comments or concerns about the way we handle your Personal Data.

You can update your Personal Data and manage your contact preferences at any time by contacting customercare@motorfuelgroup.com. You can also contact us at the following address with any questions about the way we handle your Personal Data using the details below:

Address	10 Bricket Road, St Albans, Hertfordshire AL1 3JX
Telephone	+44 (0) 1727 898890
Email	customercare@motorfuelgroup.com

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your Personal Data. Under the Data (Use and Access) Act 2025, you now have a statutory right to raise a complaint with us directly if you believe we have infringed Data Protection Laws. We will acknowledge your complaint and handle it in accordance with our internal complaints process. Similarly, in Jersey, we encourage you to raise your complaint, queries or concerns with us first if you believe we have infringed Data Protection Laws, and we will handle them in accordance with our internal complaints process.

However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to complain to the relevant authority in your jurisdiction:

- the Information Commissioner, who can be contacted: (a) online at [Make a complaint | ICO](#); (b) by phone on 0303 123 1113; or (c) by post at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF; and/or
- the Jersey Office of the Information Commissioner, who can be contacted: (a) by email at enquiries@jerseyoic.org; (b) by phone on 01534 716530; or (c) by post at 2nd Floor, 5 Castle Street, St Helier, Jersey, JE2 3BT.

If you would like this notice in another format (for example audio, large print, braille) please contact us using the details above.

An organisation is only required to appoint a Data Protection Officer under the Data Protection Laws if it is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of Personal Data on a large scale. Based on these criteria, we have determined that we do not require a Data Protection Officer to be appointed.

This Privacy Policy was last updated on 5 May 2026.