

Hyundai Bluelink Europe

Privacy Notice – Bluelink Account

Version: December, 2020

1 What is this Privacy Notice about?

This privacy notice ("**Privacy Notice**") is to inform you about the collection and processing of your personal data in connection with the provision of the Bluelink Account and your rights as a data subject.

We take your privacy very seriously and will process your personal data only in accordance with applicable data protection laws.

Any processing of your personal data in connection with the provision of the Hyundai Bluelink services via the car's infotainment system and the Hyundai Bluelink app is subject to a separate privacy notice.

2 Who is responsible for processing my data?

Meridian Enterprises Ltd is a legal entity whose company registration number is C3988. Its registered address is Pater House, Psaila Street, Birkirkara. (the "**Distributor**"). The Distributor is responsible for the processing of your personal data as detailed in this Privacy Policy. The Distributor will be acting as a joint controller together with Hyundai Motor Europe GmbH, whose registered office is at Kaiserleipromenade 5, 63067 Offenbach, Germany ("**Hyundai**"). The Distributor and Hyundai are jointly referred to in this Privacy Notice as "**we**" or "**us**".

Hyundai and the Distributor have entered into an agreement governing the processing of personal data. Upon request, the Distributor will provide information on the essence of this agreement to the User.

3 How can I contact the controller and the data protection officer?

If you have any questions about or in connection with this Privacy Notice or would like to complain about our handling of your personal data or exercise any of your rights (see section 9 below), please contact us by using the above contact details or:

Meridian Enterprises Ltd
Email address: fmamo@pater.com.mt
Telephone: 00356

4 What categories of personal data are processed?

In connection with the Bluelink Account we collect and process your name, your email address, your date of birth, your mobile phone number, your password, the fact that you have accepted the Terms of Use – Bluelink Account, the verification PIN, the Car ID and the activation code.

5 For what purposes and on what legal basis is my data processed?

We will process the personal data that you provide during the registration of your Bluelink Account and the further use of your account within the Bluelink application which you have downloaded in your app store:

- to manage your Bluelink Account (from logging in through the Bluelink application until the Bluelink Account is terminated);
- to provide you with all the Bluelink Account features;
- to give you access to our services for which a Bluelink Account is required; and
- to notify you of any updates to the Bluelink Account.

We process your personal data on the basis that it is necessary to perform our contract with regards to the Bluelink Account (Art. 6(1)(b) EU General Data Protection Regulation ("**GDPR**")).

Any further data processing regarding particular telematics services and personal data connected to it (such as a particular VIN or vehicle use related data) is subject to separate privacy notices for the respective service(s).

For any other purposes we process your personal data only if we are obligated to do so based on legal obligation (e.g., transfer to courts or criminal prosecution authorities), if you have consented to the respective processing or if the processing is otherwise lawful under applicable law. In such cases we will provide you with additional information about the processing of your personal data.

6 With whom is my data shared?

Any access to your personal data is restricted to those individuals that have a need to know in order to fulfill their job responsibilities.

Your personal data may be transferred for the above purposes to the recipients and categories of recipients listed below and processed by those recipients for the above purposes:

- Private third parties – Affiliated or unaffiliated private entities other than us that, alone or jointly with others, determine the purposes and means of the processing of personal data.
- Data processors – We transmit your personal data to certain third parties, whether affiliated or unaffiliated, that process your data on behalf of the Distributor under appropriate instructions as necessary for the respective processing purposes. The data processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the personal data, and to process your personal data only as instructed.

The current data processor for the Bluelink Account is Hyundai Autoever Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany.

- Governmental authorities, courts, external advisors, and similar third parties that are public bodies as required or permitted by applicable law.

7 Is my data transferred abroad?

Some of the recipients of your personal data will be located or may have relevant operations outside of your country and the EU/EEA, e.g. in the Republic of Korea, where the data protection laws may provide a different level of protection compared to the laws in your jurisdiction and where an adequacy decision by the European Commission does not exist.

Once data is transferred abroad we will inform you separately in accordance with any applicable laws. With regards to data transfers to such recipients outside of the EU/EEA we provide appropriate safeguards, in particular, by way of entering into data transfer agreements which include standard clauses adopted by the European Commission (e.g. Standard Contractual Clauses (2010/87/EU and/or 2004/915/EC)) with the recipients or taking other measures to provide an adequate level of data protection. A copy of the respective measure we have taken is available via our data protection officer (see section 3 above).

8 How long will my data be stored?

We and/or our service providers store your personal data to the extent necessary for the performance of our obligations and for the time necessary for the purposes for which we have collected your personal data, in accordance with the applicable data protection laws. When we no longer need to process your personal data for such purposes, we will erase it from our systems and/or records and/or take steps to properly anonymise it so that you can no longer be identified from the data (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject). Personal data contained in contracts, communications and business letters may be subject to statutory retention requirements, which may require retention of up to ten (10) years. If applicable, we will delete any other personal data about you, in principle, five (5) years after the termination of the related contractual relationship between you and us, if applicable.

9 What rights do I have and how can I exercise them?

If you have given your consent to the processing of your personal data, you can withdraw your consent at any time for future processing. Such a withdrawal will not affect the lawfulness of any processing prior to your withdrawal of consent.

Pursuant to applicable data protection laws, you have the following rights with respect to the processing of your personal data.

9.1 **Right of access:** You have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to your personal data. This information includes – inter alia – the purposes of the processing, the categories of your personal data concerned, and the recipients or categories of recipients to whom your personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You also have the right to obtain a copy of the personal data about you undergoing processing. For any further copies you might request, we may charge a reasonable fee based on administrative costs.

9.2 **Right to rectification:** You have the right to the rectification of any inaccurate personal data concerning you. Depending on the purposes of the processing, you have the right to have incomplete personal data updated, including by means of providing a supplementary statement.

9.3 **Right to erasure ("right to be forgotten"):** Under certain circumstances, you have the right to the erasure of your personal data and we may be obliged to erase your personal data.

9.4 **Right to restriction of processing:** Under certain circumstances, you have the right to have a restriction placed on the processing of your personal data. In this case, the relevant data will be marked and may only be processed by us for certain purposes.

- 9.5 **Right to data portability**: Under certain circumstances, you have the right to obtain from us a copy of your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format. You have the right, without hindrance from us, to transfer this data to you or have it transferred directly by us to another entity.
- 9.6 **Right to object**: Under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, and we will be required to no longer process your personal data. If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing. This includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.
- 9.7 **Right to complain**: You also have the right to make a complaint with the competent data protection supervisory authority which, in the United Kingdom, is the Information Commissioner's Office.

To exercise your rights please contact us as stated in section 3 above or contact the regulator directly.

10 Am I obliged to provide my data?

You are not obliged by any statutory or contractual obligation to provide us with your personal data. But if you do not provide your personal data as indicated in the registration process for your Bluelink Account, you cannot register for it.

11 How can this Privacy Notice be changed?

We may change and/or supplement this Privacy Notice from time to time in the future. In case of material changes (e.g., in particular, any changes that materially affect your rights), we will notify you. The applicable Privacy Notice can be accessed and viewed in your Bluelink Account at any time.