

# Hyundai Bluelink Europe

## Privacy Notice – Bluelink

Version: 20.05.2021

### 1. What is this Privacy Notice about?

The purpose of this privacy notice ("**Privacy Notice**") is to inform you about the collection and processing of your personal data in connection with the provision of Hyundai Bluelink services ("**Services**") via the car's infotainment system (this is the head unit of your vehicle) and the Hyundai Bluelink app ("**App**").

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

Any processing of your personal data regarding the registration of the underlying Bluelink Account (including personal data about you such as your name, your email address, your date of birth, your mobile phone number) 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**".

The Distributor will provide you with guidance by e.g. providing support services when actively using the Services, while Hyundai will steer the provision of the App and the underlying services on an organizational and technical level. Both the Distributor and Hyundai may use your personal data for further purposes as described below. The Distributor shall be the contact point for any data subject request concerning the processing of personal data in connection with the Services. However, you will remain entitled to exercise your rights under the GDPR and national data protection laws in respect of and against each of the controllers.

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 you.

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

- 3.1. If you have any questions about or in connection with this Privacy Notice or the exercise of any of your rights, you may contact the Distributor's customer call centre whose number is +356 2269 2100. You may also contact Hyundai by email to [fmamo@pater.com.mt](mailto:fmamo@pater.com.mt)

### 4. What categories of personal data are processed, for what purposes and on what legal basis?

#### 4.1. Our processing of your personal data

#### 4.1.1. Provision of the Bluelink Services

We collect and process your personal data in connection with the Services only insofar as the collection and processing is:

- necessary for the conclusion or the performance of the Bluelink contract (Art. 6(1)(b) GDPR),
- where required by law (Art. 6(1)(c) GDPR),
- where based on a consent (Art. 6(1)(a) GDPR), or
- where it is necessary for the purposes of legitimate interests of us or third parties (Art. 6(1)(f) GDPR).

For details on individual Services, please look at the relevant service description in the Bluelink Terms of Use – Bluelink Application.

All (personal) data described in Sections 4.3, 4.4, 4.5 and their subsections below is collected directly from your vehicle (e.g. its sensors and related applications as made accessible through the infotainment system) or were made available by you through the App (e.g. by entering certain personal data via the App) and is processed in connection with the Services.

The data described in Sections 4.3, 4.4 and 4.5 and its subsections below is required to provide the Services. Without the respective information, the Services cannot be performed.

#### 4.1.2. Processing for other purposes

Apart from the provision of the Services, we will process your personal data also for other purposes as further described below.

- **Product improvement / development:** We will further analyse and improve the Services to develop new mobility and mobility-related products and/or services, to secure our products and/or to improve our Services. For these purposes, we automatically analyse the data collected when providing Services based on statistical and mathematical models to identify potential for improvements. More details are provided in Section 4.5.

The legal basis for any such processing is Art. 6(1)(f) GDPR (legitimate interests of Hyundai and Distributor to process your personal data to develop and improve our Services).

- **Monitoring of products / product liability:** In this context we process your personal data for monitoring our products, providing sufficient IT security standards or to defend us or third parties against product liability and other legal claims made with regard to our products and services.

Insofar as such processing is not required by law (Art. 6(1)(c) GDPR), the legal basis for any such processing is Art. 6(1)(f) GDPR (legitimate interests of Hyundai and the Distributor to process your personal data for the purposes as indicated above).

- **Other purposes:** We process your personal data for other purposes only if obligated to do so on the basis of legal requirements (Art. 6(1)(c) GDPR, for

example, transfer to courts or criminal prosecution authorities, to provide certain functionalities in the car such as the “eCall” as based on Regulation (EU) 2015/758), if you have consented to the respective processing (Art. 6(1)(a) GDPR), or if the processing is otherwise lawful under applicable laws. If processing for another purpose takes place, Hyundai and/or the Distributor will provide you with additional information, as appropriate.

#### **4.1.3. No automated decision-making**

Neither Hyundai nor the Distributor engages in automated decision-making, including profiling, in connection with the Services unless you have been expressly notified otherwise by other means.

### **4.2. Hyundai Account**

The Hyundai Account is required to register for numerous services (provided by us or by cooperating third parties). The underlying processing of your personal data is necessary to enter into and to perform a contract with you (Art. 6 (1) b) GDPR) and based on our legitimate interest to improve your customer experience by providing you with a centralized user account (Art. 6 (1) f) GDPR).

The Hyundai Account is a central user account in which you can manage your personal master data and which you can use as a Single Sign-On for your linked services. To use our Bluelink Services it is necessary to create a Hyundai Account or to log in with an existing Hyundai Account. In this case, the Bluelink Services will be linked to your Hyundai Account and your personal master data (your email address and mobile phone, your salutation, first and last name, your country and your preferred language) will be displayed.

For more information please refer to the separate Privacy Notice of the Hyundai Account which is accessible [here](#).

### **4.3. Provision of Bluelink Services – Vehicle infotainment system**

#### **4.3.1. Hyundai Live**

Hyundai Live enables you to access the following functions:

- Live traffic: Live traffic information to calculate routes including precise arrival times and display traffic situation based on your current location
- Live parking: On and Off Street parking, nearby destination, nearby scrolled mark, nearby city centre based on your current location
- Live filling stations: Information about the nearest fuel stations and fuel prices based on your current location
- Live EV point of interest (POI) (*only for Electric Vehicles and Plug-in Hybrid Electric Vehicles*): Information on nearby charging stations including availability status and charger type based on your current location
- Weather: Local weather information based on your current location
- Hyundai service: Hyundai nearby dealer or service location information based on your current location
- Live POI and Live free text search: Information on nearby POI based on your current location

- Camera/danger zone alerts (*if legally permissible in your country*): The system provides alerts in areas where accidents are particularly common and warns you about accident black spots or speed cameras

The provision of our Hyundai Live Services requires the collection and processing of your Vehicle Identification Number (VIN), geolocation data (e.g. GPS coordinates for “Live Traffic Information”), the Integrated Circuit Card Identifier of your vehicle's SIM card (ICCID) and a Unique request ID for any transaction. We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR).

#### **4.3.2. Voice Recognition**

Voice Recognition enables you to use spoken commands to access and control the infotainment system and to draft and send text messages via a connected mobile device.

For this function, the following categories of personal data are processed and sent to our Bluelink cloud environment: Voice recording, geolocation data (GPS coordinates), point of interest (POI) and the Cerence User ID. This is a unique ID for the registration on the server of Cerence B.V., Netherlands, our data processor for these specific services. There is no link between the Cerence User ID to the Vehicle Identification Number (VIN) or any other identifiers, which has the effect that Cerence B.V., Netherlands cannot identify a natural person from the data transmitted to it. Once you start your vehicle, Voice Recognition is activated as a pre-setting in its online mode. We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR).

When using Online Voice Recognition, we process your personal data in our Bluelink cloud environment. In addition, we collect voice samples and GPS coordinates and store them for up to 90 days in order to perform and improve the voice recognition service. We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR) and where related to the improvement of the services based on our respective legitimate interests (Art. 6(1)(f) GDPR). When you use the Online Voice Recognition, your voice samples and GPS coordinates are processed by our service provider Cerence B.V., Olympia 2 D, 1213 NT Hilversum, Netherlands (data processor) and its sub-processors, which may be located in countries outside the EU/EEA and may not provide for an adequate level of data protection.

You can deactivate the Online Voice Recognition and use the Voice Recognition services in an offline mode where no data is transmitted outside of your vehicle. If you do not want us to process your voice samples and GPS coordinates, you can use Offline Voice Recognition, which does not use your voice samples and GPS coordinates to improve the voice recognition service.

#### **4.3.3. Vehicle Diagnostics**

Vehicle Diagnostics gathers active trouble codes (meaning the vehicle's error messages) from all control units integrated in your vehicle together with the Vehicle Identification Number (VIN). The active trouble codes and VIN will be sent to our server for further analysis. Within the Vehicle Diagnostics section of the infotainment system you can view all active trouble codes for your vehicle. We use this data to provide you with information concerning whether there is an issue with your vehicle. We process your personal data for Vehicle Diagnostics to perform our Services (Art. 6(1)(b) GDPR).

Insofar as Meridian Enterprises Ltd or Hyundai are required to do so by law, we process your aforementioned personal data for monitoring the products and to comply with product

security requirements (Art. 6(1)(c) GDPR). For processing the above data for the improvement and development of the products see also Section 4.5 below.

#### **4.3.4. Connected Routing**

Connected Routing allows the calculation of more accurate traffic forecasting, more precise times of arrival and more reliable route recalculations by processing the relevant data on our Bluelink cloud environment instead of only on your infotainment system.

For this function the following categories of personal data are processed and sent to our Bluelink cloud environment: Your Vehicle Identification Number (VIN) geolocation data (GPS coordinates) and navigation data (e.g. real time traffic; pattern of traffic information).

We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR).

#### **4.3.5. Bluelink User Profile**

Bluelink User Profile allows you to save various vehicle settings in our Bluelink cloud environment and apply them to different vehicles. If two or more drivers use the same vehicle but prefer different settings (e.g. for audio or map view etc.), these individual settings can be stored individually in up to two user profiles plus one guest profile per vehicle.

For each user profile the following categories of personal data are processed and sent to our Bluelink cloud environment: Vehicle Identification Number (VIN) of your vehicle and the target vehicle (if appropriate), driver number, account number, phone number, user picture, profile data as well as phone connection, Bluetooth settings, date/time settings, general settings, sound settings, display settings, Voice Recognition settings, radio settings, vehicle settings, navigation settings and points of interest (POI).

We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR).

#### **4.3.6. Notification Centre**

Through the Notification Centre we can send you important information about your vehicle. We will use this service only for important information. The information will appear as a pop-up in the infotainment system of your car. You can deactivate receipt of certain types of information in the settings or directly when receiving a pop-up.

For this function, the following categories of personal data are processed: read status; reading time.

We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR).

#### **4.3.7. Calendar**

The calendar allows you to synchronize your Google or Apple calendar on your smartphone with the integrated calendar function of the infotainment system of your vehicle in order to use it to set the navigation destination.

For this function the following categories of personal data are processed and sent to our Bluelink cloud environment: email address, calendar ID, phone number, Google

Token/iCloud password and calendar entries (e.g. title of schedule, date/time, address, memo, attendance etc.).

We process your personal data for these purposes to perform our Services (Art. 6 (1) b) GDPR).

#### **4.4. Provision of Bluelink Services – App**

##### **4.4.1. Remote Services**

Through the App we will provide you with the following Remote Services. They will be activated as a pre-setting if not deactivated separately or entirely:

- a) Remote lock and unlock (you can lock and unlock the vehicle doors; *all Hyundai vehicles*)
- b) Remote charging (you can remotely activate the electric battery charging function; *all Hyundai EV and PHEV vehicles*)
- c) Scheduled charging (you can remotely set the electric battery charging schedule (*all Hyundai EV and PHEV vehicles*) including the target temperature; *all Hyundai EV vehicles*)
- d) Remote climate control (you can set the temperature and activate the A/C remotely; *all Hyundai EV vehicles*)
- e) Find my car (you can localize the parking position of your Hyundai vehicle on the integrated map; *all Hyundai vehicles*)
- f) Send to car (you can search online for points of interest (POI) and address data in order to send search results from your smartphone application to the infotainment system of your car)
- g) My car POI (synchronizes your stored POI between the infotainment system and your App; *all Hyundai vehicles*)
- h) Last mile navigation (sends the current location of your car and information about your destination (e.g. name, address, geolocation data) to your smartphone to guide you from your parking spot to your destination via Google Maps or augmented reality; *all Hyundai vehicles*)
- i) Valet parking mode (protects your private infotainment information by showing only the valet mode screen on your infotainment system unless you enter the password you have previously selected; sends information about current status of valet parking mode on/off, current vehicle location (GPS coordinates), valet mode start/end date, valet mode run/mileage/engine time, vehicle max speed, vehicle run distance and engine idle time to your smartphone; *all Hyundai vehicles*)
- j) Battery charging status (shows you the battery charging status of the electric engine; *all Hyundai EV and PHEV vehicles*)
- k) Push notifications for certain use cases (the application sends to your smartphone push notifications in certain cases, for example: your Hyundai vehicle is unlocked and burglar alarm activation in your Hyundai vehicle, windows of your vehicle are open, rear seat alert, engine idling alarm, high voltage battery discharge alarm, valet parking mode activated/deactivated etc.; *all Hyundai vehicles*)

You can deactivate all Remote Services separately.

In order to provide you with the Remote Services once connected through the App, a connection is established between your vehicle and our Bluelink cloud environment which requires the processing of certain vehicle-related data including your vehicle SIM card's IP address, the Vehicle Identification Number (VIN) and further App user-related data (your device's IP address, PIN and further user account information such as your user name).

The provision of the Remote Services requires the collection and processing of certain data relating to your vehicle including a password, your vehicle's Vehicle Identification Number (VIN) and geolocation data (e.g. GPS coordinates for "Find my Car"), the Integrated Circuit Card Identifier of your vehicle's SIM card (ICCID), address data and vehicle-related technical data (e.g. vehicle status information such as ignition on/off, vehicle speed, light status, lock status).

We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR).

#### **4.4.2. Vehicle Status Information via Bluelink**

Through the App we will provide you with the following Vehicle Status Information:

- a) Vehicle report (provides you with information about the usage of your Hyundai car and diagnostics like airbag, brakes, tyre pressure etc. (see Section 4.3.3); *all Hyundai vehicles*)
- b) Status update (provides you with information about the vehicle status of your Hyundai car, regarding distance to empty, fuel level, engine on/off, door lock status, air condition on/off, tailgate open/close, bonnet open/close, windows open/close, battery (*all Hyundai vehicles*); high voltage battery status, battery charging status (*all Hyundai EV and PHEV vehicles*))
- c) My trips (provides you with information about the Hyundai vehicle usage per month/day, including driven time, mileage, vehicle average speed, vehicle max speed; *all Hyundai vehicles*)

In order to provide you with the Vehicle Status Information once connected through the App, a connection is established between your vehicle and our Bluelink cloud environment which requires the processing of certain vehicle-related data including your vehicle SIM card's IP address, the Vehicle Identification Number (VIN) and further App user-related data (your device's IP address, PIN and further user account information such as your user name).

The provision of the Vehicle Status Information requires the collection and processing of certain data related to your vehicle (e.g. the time driven, mileage, vehicle average speed, vehicle max speed) and vehicle-related technical data (e.g. vehicle status data such as engine on/off, door lock status etc. as further listed above).

We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR).

#### **4.4.3. Car Sharing**

You can share the Remote Services with other users through the "Request to Share Car" function in the application.

When you do so, we process certain vehicle and user account related data such as your PIN, Vehicle Identification Number (VIN), your user name and the other user's phone number to initiate and process your sharing request. Share request information such as your name and PIN will be transmitted to and processed in the other user's App. The other

user can use the App in the same way as you. He/she can also use the “*Find my Car*” function.

We process the personal data for sharing the Remote Services to perform our Services (Art. 6(1)(b) GDPR) and for the purposes of our legitimate interests in delivering our Services (Art. 6(1)(f) GDPR).

**Please note** that when you use this service, you will share all of your personal data, excluding your log-in details, stored in the App with the other users. You can deactivate this function at any time. The deactivation stops the data sharing and we will delete all shared data on the other user’s App.

#### **4.4.4. Other location based services**

- a) View previous trips;
- b) Send a destination to the car for a tour and add tourpoints to a planned tour;
- c) Find your favourite and recent points of interest (POI);
- d) Share your POI.

The provision of these Remote Services requires the collection and processing of certain vehicle-related data such as the vehicle’s geolocation data (GPS coordinates).

We process your personal data to provide you with these other location-based services to perform our Services (Art. 6(1)(b) GDPR).

#### **4.4.5. Bluelink User Profile**

Bluelink User Profile allows you to save various vehicle settings in our Bluelink cloud environment and apply them to different vehicles. If two or more drivers use the same vehicle but prefer different settings (e.g. for seat position, audio or map view etc.), these individual settings can be stored individually in up to two user profiles plus one guest profile per vehicle.

For each user profile the following categories of personal data are processed and sent to our Bluelink cloud environment: Vehicle Identification Number (VIN) of your vehicle and the target vehicle (if appropriate), driver number, account number, phone number, user picture, profile data as well as phone connection, Bluetooth settings, date/time settings, general settings, sound settings, display settings, Voice Recognition settings, radio settings, vehicle settings, navigation settings and points of interest (POI).

We process your personal data for these purposes to perform our Services (Art. 6(1)(b) GDPR).

#### **4.4.6. Use of Touch ID and Face ID (iOS) or fingerprint and face recognition (Android)**

You can use certain functions of our App with Touch ID or Face ID (iOS) or fingerprint and face recognition (Android) instead of your PIN.

Your biometric data are only stored locally on your smartphone device and is not transmitted to us and we cannot access this data. Only the information as to whether the verification of the biometric data was successful is transmitted to our App by a system function of your smartphone.



You can turn off the use Touch ID or Face ID (iOS) or fingerprint and face recognition (Android) at any time in our App.

#### **4.5. Product improvement and development**

Hyundai collects and processes telematics data regarding performance, usage, operation and condition of the vehicle from your vehicle and/or your App for improving and developing its products and transfers this data to Meridian Enterprises Ltd in order to allow it to process the data for these purposes as well.

The data which is used for these purposes is limited to technical data that does not allow the respective team members to identify any natural persons. The data used to improve and develop for example the powertrain, hybrid/EV vehicles and other car functions include ABS, ABS status, steering wheel info, parking brake, traction control system, cluster information, buckle, acceleration, battery condition, door key lock, head lamp, indicator signal, light system, hands-free boot system, seat height, sunroof, wiper, navigation on/off and similar technical data and trouble codes as mentioned in Section 4.3.3.

The legal basis for the processing of your data for these purposes is the legitimate interest of Hyundai in improving the Services and developing new products and services (Art. 6(1)(f) GDPR; e.g. to identify technical malfunctions, analyze the performance of the vehicles or provide enhanced products or customer services).

In addition, your personal data as described above may be anonymised to perform our own analytics for improving and developing the products.

#### **5. What applies to data of other data subjects and to the sale and transfer of the vehicle to third parties?**

In the case of lending the car to another person or where data of other data subjects (such as a co-driver) might be collected during the use of the Services you have to ensure that the data subjects are properly informed of the data processing as described herein.

In case of sale or permanent transfer of the vehicle to a third party, please ensure that none of your personal data can be accessed through the infotainment system (e.g. by erasing trip data or destinations in the settings).

You can disconnect the vehicle from a Bluelink app (whether your own or another person's app) by deactivating Hyundai Bluelink in the infotainment system. By deactivating Hyundai Bluelink in the infotainment system, your driving data will no longer be visible in the application and your vehicle is disconnected from the application. If you do not disconnect the vehicle the data might still be accessible through the app. Your account data in the application will not be deleted until you delete your account.

#### **6. With whom is my data shared?**

Due to their role as joint controllers when offering the Services, Meridian Enterprises Ltd as well as Hyundai will receive your personal data. Any access to your personal data at Hyundai and the Distributor 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 respective purposes to the recipients and categories of recipients listed below and processed by those recipients for the respective purposes:

- Hyundai – Hyundai receives your personal data in its role as technical and operational provider of the Services and will transmit certain data to Meridian Enterprises Ltd as described above (e.g. for product development purposes).
- Other private third parties – We transmit your personal data to certain private entities that help us in offering the Services. For instance, we rely on telecommunication services provided by telecommunication providers.
- Data processors – We transmit your personal data to certain third parties, whether affiliated or unaffiliated, that process your data on behalf of Hyundai 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 data processor for Bluelink is Hyundai Autoever Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany.
  - For Hyundai Live and the Remote Service “Find my Car”, the data processors are: Hyundai MnSOFT, 74, Wonhyoro, Yongsan-gu, Seoul, South Korea (e.g. for operating relevant applications); Hyundai Autoever Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany (e.g. for hosting and support).
  - For Voice Recognition, the data processors are: Cerence B.V. Netherlands, Olympia 2 D, 1213 NT Hilversum, Netherlands; Hyundai MnSOFT, 74, Wonhyoro, Yongsan-gu, Seoul, South Korea (e.g. for operating relevant applications); Hyundai Autoever Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany (e.g. for support).
  - The data processors for call centre services are affiliates of Hyundai, which are all located in the EU/EEA.

These data processors may also use sub-processors for the provision of the respective services.

- 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 or the United States of America (e.g. Cerence’s sub-processors), where the data protection laws may provide a different level of protection compared to the laws in your jurisdiction and for which an adequacy decision by the European Commission does not exist.

With regard 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)) or taking other measures to provide an adequate level of data protection. A copy of the relevant measure we have taken is available via Hyundai’s data protection officer (see Section **Error! Reference source not found.** above).

## 8. How long will my data be stored?

- 8.1.** Your personal data is stored by Hyundai and/or our service providers, strictly to the extent necessary for the performance of our obligations, and strictly for the time necessary to achieve the purposes for which the personal data is collected, in accordance with applicable data protection laws. Under no circumstances will your personal data be stored after the termination of your account. When Hyundai no longer needs to process your personal data, 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 Hyundai is subject; e.g., personal data contained in contracts, communications, and business letters may be subject to statutory retention requirements, which may require retention of up to 10 years).
- 8.2.** There are specific storage periods for the following items:
- Voice Recognition: Voice samples and GPS coordinates (see Section 4.3.2 above) are stored up to 90 days
  - Hyundai Live: geolocation data (GPS coordinates) and Service ID (see Section 4.3.1 above) are stored up to 93 days.
- 8.3. Termination of account:** If you choose to terminate your account (e.g. by setting the relevant preference in the car's infotainment system or in the App's menu under "My Account") all personal data related to your account will be deleted, unless retention periods apply (see Section 8.1 above).
- 8.4. Reset of account:** Your account may be reset by setting the respective preference (e.g. in the vehicle's infotainment system). Upon reset of the account, you will be logged out of Hyundai Bluelink and will have to perform a new sign-up procedure or log in with different credentials if you intend to use Hyundai Bluelink.

## 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 the 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. Please note that these rights might be limited under the applicable national data protection laws.

- 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, 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 respective data will be marked and may only be processed by us for certain purposes.
- 9.5. **Right to data portability**: Under certain circumstances, you may 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 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 processing 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, which 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 in your country of origin.

**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. You do not need to provide your personal data for the conclusion of a contract. But if you do not provide your personal data, it is possible that the usability of our Services will be limited for you.

**11. Can I deactivate the Online Mode (Offline Mode; Modem Off)?**

You may choose to deactivate the Online Mode by setting the respective preference. If Online Mode is turned off (Offline Mode), all Bluelink functions are disabled and no personal data, in particular no geolocation data (GPS coordinates), is collected for Bluelink and an Offline Mode icon is displayed at the top of the infotainment system screen in the vehicle.

**12. How can this Privacy Notice be changed?**

We may change and/or supplement this Privacy Notice from time to time in the future. Such changes and/or supplements may be necessary in particular due to the implementation of new technologies or the introduction of new services. We will publish the changes on our websites and/or in your car's infotainment system and in the App.