

# KIA APP

## Privacy Notice

Last updated: 27 November 2025

1. INTRODUCTION
2. CONTROLLER
3. DATA PROTECTION OFFICER
4. COLLECTION OF PERSONAL DATA
5. TYPES OF PERSONAL DATA THAT WE PROCESS
6. PURPOSES OF PROCESSING AND LEGAL BASES FOR PROCESSING
7. COOKIES AND OTHER TECHNOLOGIES
8. RECIPIENTS OR CATEGORIES OF RECIPIENTS
9. INTERNATIONAL TRANSFER OF PERSONAL DATA
10. DATA RETENTION
11. YOUR LEGAL RIGHTS
12. KIA APP TERMS OF USE
13. UPDATES
14. DEFINITIONS

### 1. INTRODUCTION

This privacy notice ("**Kia App Privacy Notice**") is issued by Kia Connect GmbH ("**Kia Connect**", "**we**", "**us**", and "**our**") and is addressed to individuals that use the Kia App (together, "**you**"). When you use the Kia App and the various functions and features of the Kia App ("**Kia App Services**"), we will Process Personal Data relating to you as further set out in this Kia App Privacy Notice. Defined terms used in the Kia App Privacy Notice are explained in Section 14 below.

Please note that in addition to the Kia App Privacy Notice, we may inform you about the Processing of your Personal Data separately where appropriate, for example in consent forms or separate privacy notices.

If you are a user of the fleet management functionality ("**Kia App B2B Mode**"), please refer to the Kia App (B2B) Privacy Notice for information about our Processing of your Personal Data in connection with the "**Kia App B2B Mode**".

The Kia App Services include, inter alia, features and functions that require the activation of connectivity in your vehicle ("**Connected Services**"). Details about our Processing of your Personal Data in connection with the Connected Services are provided in a separate privacy notice ("**Kia Connect Privacy Notice**"), which is available here: <https://connect.kia.com/uk/kia-connect-privacy-notice/>

### 2. CONTROLLER

Unless expressly stated otherwise, Kia Connect GmbH is the Controller of the Processed Personal Data as set out in this Kia App Privacy Notice.

If you have any questions about the Kia App Privacy Notice or our Processing of your Personal Data, or if you wish to exercise any of your rights, you may contact us at:

– Kia Connect GmbH, Theodor-Heuss-Allee 11, 60486 Frankfurt am Main, Germany, Email: [info@kia-connect.eu](mailto:info@kia-connect.eu)

You may also use our contact form, which is available via the link in the My Page menu of the Kia App or here: <https://connect.kia.com/eu/customer-support/contact-form/>

Alternatively, you may also contact our data protection officer at the contact details provided in Section 3 below.

### 3. DATA PROTECTION OFFICER

We have designated an external data protection officer ("**DPO**"). You may contact our DPO at:

– Kia Connect GmbH, Data Protection Officer, Theodor-Heuss-Allee 11, 60486 Frankfurt am Main, Germany, Email: dpo@kia-connect.eu.

#### 4. COLLECTION OF PERSONAL DATA

We collect or obtain Personal Data about you from the following sources:

- **Data provided to us:** We obtain Personal Data when those data are provided to us by you (e.g. when you register with the Kia App, or when you contact us via email, telephone, our contact form, or by any other means).
- **Relationship data:** We collect or obtain Personal Data in the ordinary course of our relationship with you.
- **App data:** We collect or obtain Personal Data when you use the Kia App.
- **Third party information:** We collect or obtain Personal Data from third parties who provide it to us (for example, from dealers or workshops in relation to Online Service Bookings (cf. Section 6.5.3), from Digital Charging Solutions GmbH (operator and provider of the Kia Charge App) in relation to the Charging History service (cf. Section 6.5.7, from Kia Corporation in relation to the Warranty Booklet (cf. Section 6.5.8), and from the Kia national sales company or distributor in your country in relation to Mandatory Vehicle Inspection Reminders (cf. Section 6.5.10)).
- **Kia Connect App:** If you are a user of the Kia Connect App and register with the Kia App, your user profile information, vehicle data and certain settings from the Kia Connect App will be transferred to the Kia App to ensure a smooth transition between the different versions of the app.

#### 5. TYPES OF PERSONAL DATA THAT WE PROCESS

We Process the following types of Personal Data relating to you ("**Relevant Personal Data**"):

- **Personal Details:** Data that relates directly to you as a person (e.g. name(s), country).
- **Contact Details:** Data that enables communication or verification (e.g. email address, mobile number (only required in connection with Connected Services)).
- **Kia Account Data:** Data that relates to your Kia Account (e.g. username; password; email address; first name; last name; country; Unique User Identifier ("**UUID**")).
- **User Profile Information:** Data that relates to your Kia App user profile, including your Kia Account Data (e.g. system configuration information, preferred settings (e.g. language), profile picture and profile name (optional)).
- **Contract Data:** Data that relates to the conclusion and termination of a contract, including the acceptance and termination of the Kia App Terms of Use and the date and time of acceptance and termination (e.g. content of the contract, type and date of conclusion, duration).
- **Consent Records:** Records of any consent you have given, together with the date and time, means of consent, and any related information (e.g. subject matter of the consent).
- **Communication Data:** Data that forms the content of communication (e.g. content of conversations, written correspondence).
- **Vehicle Data:** Data relating to your vehicle (e.g. vehicle identification number ("**VIN**"); model information; registration date; registration number (optional); warranty start date and end date; mileage driven; estimated annual mileage driven; service dates; MOT test dates).
- **Location Data:** Data that relates to the location of your device (e.g. GPS data) or location information that you provide to us in connection with the Kia App Services.
- **Dealer and Workshop Information:** Data that relates to your selected Kia dealers and workshops (e.g. name, address and contact details of dealer/workshop and opening hours).
- **Online Service Bookings Data:** Information provided by you in relation to a request for an Online Service Booking (as defined below) (e.g. drop-off time/preferred time slot; chosen services; additional repairs; selection of offers and promotions; transportation options).
- **Charging History Data:** Information about your charging history (e.g. charging station information, charging time and costs).
- **Vehicle Health Check Data:** Information about the status of the relevant vehicle (e.g. status of brakes, filters, lights, wiper blades) based on the vehicle health check-up conducted during last service at the Kia dealer or workshop.
- **Service Tracking Information:** Information on the status of your vehicle's servicing, including received, in workshop, ready for pickup, and closed.
- **Vehicle Service History:** Date of service; service description (servicing performed on the vehicle); mileage driven at the time of service; dealer information (name of dealer, dealer contact details).
- **Technical Data:** Technical information that relates to your device or software in your device used for accessing and connecting with the Kia App (e.g. app settings; IP address, language settings, time stamps, UUID, device data (e.g. device type, operating system), browser type; browser settings; dates and times of your connection to the Kia App; app version and app crash information).
- **Views and Opinions:** Any views and opinions that you choose to share with us, such as feedback and responses to surveys.
- **Image/Video Data:** Image/video data collected through authorised access to your device camera.

- **Pseudonymised Identifiers:** Generated IDs that are used in connection with other data about you, but which cannot be attributed directly to you without the use of additional information (e.g. user profile ID, UUID).
- **Verification Data:** Data that enables verification of inputs and actions (e.g. verification PIN, activation code, SMS authentication code, status of verification, tokenised credentials).
- **Usage Data:** Records of your interactions with our content in the Kia App (sections of the app visited; time of access; access of content).

## 6. PURPOSES OF PROCESSING AND LEGAL BASES FOR PROCESSING

The purposes for which we Process the relevant Personal Data, subject to applicable law, and the legal bases on which we perform such Processing are as follows:

### 6.1. DOWNLOADING THE KIA APP

When you download the Kia App, certain data will be processed by the app store you have chosen to use (e.g. Google Play, Apple App Store). Such data may include the time of download, your username and/or email address, your app store customer ID and/or device ID. Please note that this data is not shared with us and is Processed by the relevant app store provider as a Controller. Please refer to the privacy notices of the relevant app store operators to learn more about their Processing of your Personal Data (Apple App Store: <https://www.apple.com/legal/privacy/>; Google Play: <https://policies.google.com/privacy>).

### 6.2. APPLICATION AUTHORISATIONS ON YOUR DEVICE

For you to be able to use all functions and features of the Kia App, the app has to communicate with your device in certain ways, which requires certain authorisations from you. The authorisations are only stored locally on your device. You can manage, change and optionally use certain authorisations yourself directly in the settings of your device at any time.

For example, such authorisations are required for the following:

- **Location:** Use of services that require access to the live location of your device.
- **Camera:** Use of services that require access to the camera of your device (e.g. to scan vehicle identifiers for linking vehicles with the Kia App or QR codes).
- **Photos:** Use of services that require access to photos on your device (e.g. if you want to upload a photo from your device to the profile image feature of My Page).
- **Notifications:** Determining whether and to what extent you will be notified via: (i) a counter next to the Kia App icon (e.g. for general notifications about new features or events in the Kia App, if you are not actively using the Kia App); and/or (ii) push notifications.
- **Use of Touch ID and Face ID (iOS) or Fingerprint and Face Recognition (Android):** You can access the Kia App and/or enable and use certain Kia App Services in the Kia App with Touch ID or Face ID (iOS) or fingerprint and face recognition (Android). Any biometric data is only stored locally on your device and is not transmitted to us. Therefore, we are not able to access this data. Only the information on whether verification of the biometric data was successful is transmitted to the Kia App by a system function of your device.
- **Background Updates:** Allowing the app to update itself in the background. If this function is deactivated, you can carry out these updates yourself.

The Kia App also works if you do not grant the relevant authorisations, but in this case not all functions of the Kia App (in particular, those relating to Connected Services) can be used.

### 6.3. GENERAL USE OF THE KIA APP

When you access and use the Kia App, certain technical information that is necessary for the provision and use of the Kia App will be Processed automatically. Such information is Processed by us for the purposes of: (i) providing you with the Kia App Services; (ii) preventing and/or resolving malfunctions of the Kia App; and (iii) improving the Kia App Services.

Relevant Personal Data: Technical data.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR) and also for enabling us to pursue our legitimate interests in delivering an appropriate and error-free app to our customers (Art. 6 (1) f) GDPR).

### 6.4. REGISTRATION AND LOGGING IN

To register on the Kia App, you need to have a “Kia Account”, sign up to the Kia App using your Kia Account login details and accept the Kia App Terms of Use. When you log in, you can add and remove your Kia vehicle(s), create a user profile and use the Kia App Services accordingly.

Details about our Processing of your Personal Data in connection with the Kia Account are provided in a separate privacy notice which is available here: <https://connect.kia.com/uk/kia-account-docs/>

Relevant Personal Data: Personal details; contact details; Kia Account data; user profile information; pseudonymised identifiers; contract data; vehicle data; verification data.

Legal basis: The Processing in connection with the registration and log-in process is necessary for the performance of the contract that you have entered into with us, or for the conclusion of the contract with us (Art. 6 (1) b) GDPR). Any optional Personal Data that you provide in connection with your user profile (e.g. profile picture) is Processed on the legal basis of legitimate interests pursued by us (Art. 6 (1) f) GDPR). The legitimate interests are: providing user-friendly features and functions in the Kia App.

## **6.5. KIA APP SERVICES**

We Process Personal Data about you when you use the Kia App Services. For information about how we Process your Personal Data when you use the Connected Services, please refer to the Kia Connect Privacy Notice, which is available here: <https://connect.kia.com/eu/downloads/>.

### **6.5.1. PREFERRED DEALER INFORMATION**

This Kia App Service allows you to synchronise the “Preferred Dealer” information between your account on the MyKia website and your account in the Kia App. Synchronisation is optional and must be enabled before it can be used. As an alternative, you may manually enter information about your preferred dealer.

Relevant Personal Data: contact details, vehicle data, dealer and workshop information, technical data.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR).

### **6.5.2. DEALER SEARCH**

This Kia App Service allows you to search for relevant dealers and workshops. You may choose to manually enter a location or enable access to your device’s live location in order to filter the search results based on your preferred location or the current location of your device.

Relevant Personal Data: Location data; dealer and workshop information.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR). Use of this Kia App Service may require your authorisation to access the live location of your device.

### **6.5.3. ONLINE SERVICE BOOKING**

This Kia App Service allows you to request and book service appointments with your selected dealer or workshop and to provide additional information relating to the relevant service appointment request (e.g. drop-off time/preferred time slot; services; additional repairs; selection of offers and promotions; transportation options) (“**Online Service Bookings**”). It also allows you to search for available maintenance services based on the mileage driven of vehicles linked to the Kia App on your device. You may either manually provide the mileage driven in your vehicle(s) or have it provided to us automatically when you activate the Connected Services. Once we have received your request and subject to your prior consent, we will share your request and certain Personal Data (namely, your first name and last name, your phone number (optional) and email address, the VIN) with the selected dealer or workshop. The selected dealer or workshop may contact you in order to plan and confirm the service appointment. Please refer to the privacy notice of your selected dealer or workshop for information about their Processing of your Personal Data.

In the Kia App, we provide you with the status of your Online Service Bookings (i.e. confirmed, pending, cancelled) and also with the status of the vehicle repair (received, in workshop, ready to pick up and closed). You can also edit and cancel upcoming Online Service Bookings. Once the vehicle repair has the status “closed”, you will be able to view a digital service history and vehicle health check (eVHC) report in the app. Please note that this information will

be available to the user who first linked their account to the relevant vehicle ("**Main User**") and any further users who have linked the vehicle to their account ("**Shared Users**"). For these purposes, we will receive the relevant information from your Kia dealer or workshop.

Relevant Personal Data: Personal details; contact details; vehicle data; location data; dealer and workshop information; Online Service Booking data; vehicle health check data; service tracking information.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR). The sharing of the Personal Data with the relevant workshop or dealer is based on your prior consent (Art. 6 (1) a) GDPR).

#### 6.5.4. DIGITAL SERVICE HISTORY

When a service that was booked via the Online Service Booking is fully completed, the relevant dealer or workshop will provide information related to that service through the Kia App ("**Digital Service History**"). The Digital Service History will include information about all past services that were booked via the Online Service Booking. The Digital Service History will be available to all users of the Kia App that have linked the relevant vehicle to their profile in the app.

Relevant Personal Data: Vehicle data; vehicle service history.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR).

#### 6.5.5. CAR SHARING

You can share certain Kia App Services with other users through the "**Request to Share Car**" function in the Kia App. When you do so, we will Process certain user profile information and vehicle data to initiate and proceed with your sharing request. The other users will have access to certain information relating to your vehicle, charging, maintenance and other information Processed in the Kia App in relation to the status of your vehicle. Share request information such as your name and PIN will be transmitted to and Processed in the other user's account for the Kia App Service. The other user can use the relevant Kia App Services for linked vehicles in the same way as you.

Relevant Personal Data: User profile information; vehicle data; charging history data; Online Service Booking data; verification data.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR) and in connection with our legitimate interests in delivering our Kia App Services (Art. 6 (1) f) GDPR). Please note that when you use this Kia App Service, you will share Personal Data, excluding your login details, that are stored in your Kia App account with the other users. You can deactivate this function at any time. Deactivation stops the sharing of data, and we will delete all shared data in the other user's account for the Kia App.

For information about how we Process your Personal Data when you use "**Car Sharing**" in relation to the Connected Services, please refer to the Kia Connect Privacy Notice, which is available here: <https://connect.kia.com/uk/kia-connect-privacy-notice/>

#### 6.5.6. CHARGING POINT OF INTEREST

This Kia App Service allows you to search for charging stations. You may choose to manually enter a location or enable access to your device's live location. If you select a charging station in the Kia App, and wish to obtain the Kia Charge services, you will be forwarded to Kia Charge (as service operated and provided by Digital Charging Solutions GmbH), where you can create a Kia Charge profile and sign up for the services. In this case, we will share your Kia Account Data with Digital Charging Solutions GmbH to make your sign-up process with Kia Charge more customer-friendly and efficient.

Relevant Personal Data: Kia Account Data; vehicle data; location data.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR). Use of this Kia App Service may require your authorisation to access the live location of your device. The sharing of your Kia Account Data with Digital Charging Solutions GmbH is necessary for the purposes of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). The legitimate interests are: providing our customers with user-friendly features and functions.

#### **6.5.7. CHARGING HISTORY**

This Kia App Service allows you to review your charging history for vehicles linked to the Kia App on your device. You can only use this service if you are a customer of Kia Charge, a service operated and provided by Digital Charging Solutions GmbH. For this purpose, you need to link your Kia Charge account to the Kia App using your Kia Account Data. The information about your charging history is shared with us by Digital Charging Solutions GmbH when you request this service in the Kia App accordingly.

Relevant Personal Data: Kia Account Data; vehicle data; charging history data.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR).

#### **6.5.8. WARRANTY BOOKLET**

This Kia App Service allows you to access the warranty booklet for your vehicle(s). The warranty booklet includes information about the date of purchase, description of the available warranty items and vehicle status. The warranty booklet is shared with us by Kia Corporation when you request this service in the Kia App.

Relevant Personal Data: Contract data; vehicle data.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR).

#### **6.5.9. OWNER'S MANUAL**

This Kia App Service allows you to access the owner's manual for your vehicle(s). The owner's manual includes detailed information about the model of the relevant vehicle(s) and vehicle specifications.

Relevant Personal Data: Vehicle data.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR).

#### **6.5.10. VEHICLE-RELATED NOTIFICATIONS**

- Recall Campaign Notifications & Service Reminders: Within the Kia App or via other communication channels, we will send you: (i) notifications about open recall campaign(s); and (ii) reminders for upcoming regular maintenance dates for your Kia vehicle.
- Service Action Notifications: Subject to obtaining your prior consent, we will inform you about outstanding recommended service actions (such as software updates, part replacements with improved parts or quality checks to be carried out on certain components of your Kia vehicle). Information on recommended service actions may be provided to you within the Kia App, via the Head Unit of your vehicle (if you have activated the Connected Services) or via email to your registered email address.
- Mandatory Vehicle Inspection Reminders (such as TÜV in Germany or MOT in the UK): We will inform you about upcoming mandatory vehicle inspections. For example, reminders about the "Ministry of Transport" test (commonly referred to as "MOT") for vehicles in the UK. With the exception of the "MOT" in the UK, in order for us to provide this service we require the date that your vehicle was first registered so that we can determine the date of the next inspection. This will be shared with us by the Kia national sales company or distributor in your country. For vehicles registered in the UK, we have been authorised by the Department for Transport ("DfT") of the Government of the UK to access certain MOT vehicle history data (namely, MOT due dates and vehicle registration numbers) via the DfT's MOT history API. As we usually do not Process vehicle registration numbers, we will work with Kia UK Limited to match the vehicle registration number with the VIN so that we can provide you with this service.

Please note that we will inform the Kia national sales company or distributor in your country about the vehicle-related notifications that we have sent to you to prevent you from receiving the same message via multiple channels from different Kia group companies.

Relevant Personal Data: Consent records; vehicle data, pseudonymised identifiers.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR). The Processing of data for Service Action Notifications is subject to your prior consent (Art. 6 (1) a)

GDPR). Your consent is voluntary and can be withdrawn at any time. The withdrawal of your consent will not affect the lawfulness of Processing based on such consent before its withdrawal. The sharing of the referenced information with the relevant Kia national sales company or distributor is necessary for the purpose of legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: providing the best possible service to our customers (sharing this information will avoid frustration for customers due to receiving the same message via multiple channels and from different Kia group companies)

#### 6.5.11. Tyre Concierge

Within the Kia App you can access “Tyre Concierge”, which is a service provided by Michelin (Manufacture Française des Pneumatiques Michelin SAS). “Tyre Concierge” indicates the tyre status and allows the User to select new eligible tyres. It also links you to the Kia App Service “Online Service Booking” (see Section 6.5.3). “Tyre Concierge” can be accessed via an embedded window (iframe) in the Kia App. It is operated and provided directly by Michelin from their own systems, which means that Michelin Processes the Personal Data that you share with them in connection with “Tyre Concierge” as an independent Controller. Please refer to Michelin’s privacy notice for information about how Michelin Processes your Personal Data. Kia Connect does not share any Personal Data with Michelin in connection with “Tyre Concierge”.

### 6.6. OTHER PROCESSING ACTIVITIES

#### 6.6.1. COMMUNICATION

We Process your Personal Data in order to communicate with you via several communication channels (e.g. email, telephone, in-app or push notifications) in relation to the Kia App and its services (e.g. to provide customer support, inform you about technical issues, perform our contractual obligations, inform you about actions relating to Kia App Services, or inform you about changes to the Kia App Terms of Use or this Kia App Privacy Notice). We will only send you push notifications if you have given permission for this in your device settings. When you submit a request to us, we Process your Personal Data in order to handle your request. Certain fields in the contact form in the Kia App will be pre-filled to make using the contact form more convenient for you. **When you use our contact form, your enquiry is automatically classified and categorised with AI-driven features in our service cloud environment.** For information about communication regarding our marketing activities, please refer to Section 6.6.2.

Relevant Personal Data: Personal details; contact details; contract data; communication data; vehicle data; technical data; pseudonymised identifiers.

Legal basis: The Processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR), or for the purposes of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: handling customer inquiries efficiently, providing the best possible service to our customers and appropriately answering and Processing our customers’ requests.

#### 6.6.2. DIRECT MARKETING

We Process Relevant Personal Data in order to contact you via email, messages or notifications within the Kia App or other communication formats to provide you with promotional information regarding the Kia App, our products and services or products and services of other Kia group members, or to ask you to participate in surveys or to provide your feedback, usually subject to obtaining your prior opt-in consent to the extent required under applicable law.

You may give your consent by activating the respective consent buttons in the consent list provided in the Kia App or by other relevant means (if applicable). Your consent is voluntary and can be withdrawn at any time (e.g. by deactivating the respective consent buttons in the consent list in the Kia App). You may also unsubscribe from our promotional mailing list at any time by clicking on the “unsubscribe” link included in each promotional email that we send. The withdrawal of your consent will not affect the lawfulness of Processing based on such consent before its withdrawal.

If you provide us with your email address when signing up to the Kia App and its Services, we may send you information about our similar services or products to the relevant email address without asking you for your prior specific consent, without prejudice to your right to object under Section 11. This is because specific consent from you as an existing customer is not required in such cases. This also applies to sending you such information via notifications within the Kia App to the inbox which is provided separately within the app. However, you have the right to opt out of receiving such electronic mail marketing at any time without incurring any costs (other than the transmission costs according to the basic rates) (e.g. by deactivating the respective buttons in the “Service-related

Advertising" list in the Kia App). You may also unsubscribe from our promotional mailing list at any time by clicking on the "unsubscribe" link included in each promotional email that we send. In addition, you have the right to object to the Processing of your Personal Data for direct marketing purposes (see Section 11 for more details).

Through the consent list in the Kia App, we may obtain consent from you on behalf of an affiliated Kia entity to contact you for their direct marketing purposes. Where this is the case, we inform the relevant Kia entity about your consent and share your relevant contact details with them accordingly. With respect to the relevant Kia entity's direct marketing activities based on such consent, the relevant Kia entity acts as a controller and is responsible for the Processing of your Personal Data in connection with such activities. If you wish to withdraw your consent that we have obtained from you on behalf of the relevant Kia entity, in addition to deactivating the respective consent button in the Kia App, you may also contact the relevant Kia entity directly to withdraw your consent.

Relevant Personal Data: Personal details; contact details; consent records; vehicle data; technical data; pseudonymised identifiers.

Legal basis: The Processing is based on your prior consent (Art. 6 (1) a) GDPR in conjunction with applicable local marketing laws (e.g. in Germany Section 7 (2) No. 2 of the German Act against Unfair Competition ("UWG")); or it is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR in conjunction with the applicable local marketing laws (e.g., in Germany Sec. 7 (3) UWG)). Our legitimate interests are: promoting our services and products.

Your consent is voluntary and can be withdrawn at any time. The withdrawal of your consent will not affect the lawfulness of Processing based on such consent before its withdrawal.

#### **6.6.3. FEEDBACK AND SURVEYS**

When you provide your feedback or participate in our surveys, we may Process relevant Personal Data for the purpose of evaluating your feedback or your responses to the surveys. We do this in order to improve our services and adapt them to our customers' needs.

In some cases, we may conduct surveys using the Salesforce Marketing Cloud platform provided by salesforce.com Germany GmbH or the online survey tool SurveyMonkey provided by Momentive Europe UC ("**Momentive**"). To participate in surveys conducted on SurveyMonkey, you may have to click a link which will be included in the survey invitation. When you click on the link, you will be referred to a website of Momentive on which the survey will be conducted. Momentive will Process the information collected in the survey on our behalf and for our purposes. Furthermore, Momentive may: (i) collect and Process information about your device and other technical data in order to prevent people from completing the survey multiple times; and (ii) use cookies to recognise whether the participant has already visited the survey and to reassign responses that the relevant participant has already given.

More information about Momentive's processing of Personal Data is available at <https://www.surveymonkey.com/mp/legal/privacy/>.

Relevant Personal Data: Personal details; technical data; views and opinions.

Legal basis: The Processing is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: improving our services.

#### **6.6.4. OPERATION OF BUSINESS**

We may Process Relevant Personal Data for internal management and administration purposes, including record management or maintaining other internal protocols. In some cases, this may also require us to disclose the Relevant Personal Data to other members of the Kia group.

Legal basis: The Processing is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: ensuring the appropriate and efficient operation of our business.

#### **6.6.5. LEGAL COMPLIANCE**

We may Process Relevant Personal Data to comply with applicable laws, directives, recommendations or requests from regulatory bodies (e.g. requests to disclose Personal Data to courts or regulatory bodies, including the police).

Legal basis: Such Processing is necessary: (i) for compliance with a legal obligation to which we are subject (Art. 6



(1) c) GDPR); or (ii) for the purpose of our legitimate interests (Art. 6 (1) f) GDPR). Our legitimate interests are: ensuring our compliance with applicable legal obligations.

#### 6.6.6. LEGAL PROCEEDINGS AND INVESTIGATIONS

We may Process Relevant Personal Data in order to assess, enforce and defend our rights and interests.

Legal basis: The Processing is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: protecting our interests and enforcing our rights.

#### 6.6.7. WEB ANALYSIS AND OPTIMISATION

We Process certain Personal Data for the purpose of evaluating the use of the Kia App and its functions by the Kia App users, and to compile reports on the Kia App activity. For this purpose, and subject to your prior consent, we store information in your browser or your end device (e.g. cookies) to obtain further details about your interaction with the Kia App, and compile information relating to the use of the Kia App in a user profile. This will help us to identify: (i) the times during which the App, its functions and/or content are most frequently accessed and used; and (ii) the parts or areas of the Kia App that require optimisation. Please refer to Section 7 for further details about our use of cookies and similar technologies. For this purpose, we use the tool Google Analytics. Please note that any Personal Data (in particular, the IP address) collected for the purpose of analysis in connection with Google Analytics will first be transmitted and stored on servers controlled by us, where the relevant data will be allocated to an internal user identification number (which is linked to an end device). The relevant data will then be transferred to Google only in pseudonymised form. This process is also known as "server-side tracking".

Relevant Personal Data: Consent records; technical data, usage data.

Legal basis: The Processing is based on your prior consent (Art. 6 (1) a) GDPR).

### 7. COOKIES AND OTHER TECHNOLOGIES

#### 7.1. COOKIES

We use cookies and Process related information for the purposes set out below in the Kia App.

**"Cookies"** are small text files that are transferred to your end device when you visit a website by means of your web browser or other programs. They are stored locally on your end device and kept ready for later retrieval. Cookies are generally used to make websites work, to keep track of your movements within the website, to remember your login details, to remember your preferences and interests, and so on. There are different types of Cookies, and they can be distinguished on the basis of their origin, function and lifespan.

The information Processed in connection with the use of Cookies might be information about you, your preferences or your device. The information that we Process in connection with the use of Cookies includes technical data; pseudonymised data; and usage data.

We use strictly necessary Cookies to make the Kia App work, provide it securely and to store information about your consent to or rejection of cookies ("**Strictly Necessary Cookies**"). The legal basis for the Processing of your personal data in connection with such Strictly Necessary Cookies is our legitimate interest (Art. 6(1)(f) GDPR) in operating the Kia App efficiently and providing it securely.

Subject to your prior consent, we may use Cookies that (i) allow us to measure and improve the performance of the Kia App ("**Performance Cookies**"); and/or (ii) enable the Kia App to provide enhanced functionality ("**Functional Cookies**"). The legal basis for the Processing of your personal data in connection with such cookies is your consent (Art. 6(1)(a) GDPR).

Please note that you can manage your consent preferences by using the cookie banner or accessing the "**Privacy Settings**" in the Kia App. This is also where you can find further information about each Cookie. We use the tool OneTrust provided by the service provider OneTrust Technology Limited for the purpose of Cookie-related consent management.

In addition, you will find more information about Cookies and their use in the Kia App in our Cookie Policy.

## 7.2. FIREBASE CRASHLYTICS

To improve the security and stability of the Kia App and our services, we rely on the analysis of anonymised crash reports. For this purpose, we use “Firebase Crashlytics”, a service of Google Ireland Ltd., Google Building Gordon House, Barrow Street, Dublin 4, Ireland. In order to provide us with anonymised crash reports, in the event of a crash or malfunction of the Kia App, “Firebase Crashlytics” collects the information mentioned below and may transmit such information to Google servers in the USA. Please note that the crash reports that we are provided with do not contain any information that would allow us to trace the identity of a user. Any information collected by and stored within “Firebase Crashlytics” will be deleted within 90 days following collection.

For more information about “Firebase Crashlytics” and how Google Processes your Personal Data, please refer to the following links:

<https://firebase.google.com/>; <https://firebase.google.com/terms/crashlytics/>;  
<https://firebase.google.com/support/privacy>

Relevant Personal Data: Technical data.

Legal basis: The Processing is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: ensuring and optimising the security and stability of the Kia App and our services.

## 8. RECIPIENTS OR CATEGORIES OF RECIPIENTS

We disclose Relevant Personal Data to other entities within the Kia group (“**Kia Group Members**”), for legitimate business purposes and for the operation of the Kia App and the Kia App Services, in accordance with applicable law. We also disclose Relevant Personal Data to other Kia Group Members in cases where we have obtained your prior specific consent for such disclosure. In addition, we disclose Relevant Personal Data to:

- you and, where appropriate, your appointed representatives;
- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulations;
- accountants, auditors, consultants, lawyers and other external professional advisors to us, subject to binding contractual or legal obligations of confidentiality;
- third-party Processors (such as providers of the technical infrastructure and maintenance services relevant to the Kia App Services; providers of customer data management platforms; providers of services relating to customer support (e.g. call centre services); online survey tool providers), located anywhere in the world, subject to the requirements noted below in Section 9;
- any relevant party, regulatory body, governmental authority, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal claims;
- any relevant party, regulatory body, governmental authority, law enforcement agency or court, for the purposes of prevention, investigation, detection or prosecution of criminal offences or the enforcement of criminal penalties; and
- any relevant third-party acquirer(s) or successor(s) in title, in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation).

Furthermore, we disclose Relevant Personal Data to other third-party organisations (namely, Kia dealers or workshops, the provider of Kia Charge (i.e. Digital Charging Solutions GmbH), insurance companies, leasing companies, financial service providers, fleet companies, data aggregators); however, we will only share your Personal Data with such third parties where: (i) you have given your prior consent for such disclosure (Art. 6 (1) a) GDPR); (ii) such disclosure is necessary for the performance of our contract or the relevant third party’s contract with you (Art. 6 (1) b) GDPR); or (iii) the sharing is necessary for the purpose of the legitimate interest pursued by the relevant third party to the extent that such legitimate interest is not overridden by your interests, fundamental rights or freedoms (Art. 6 (1) f) GDPR).

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

## 9. INTERNATIONAL TRANSFER OF PERSONAL DATA

We are a member of an international group of companies. Therefore, we may transfer Personal Data within the Kia

group and to other third parties as noted in Section 8 above. Some of these recipients may be located or have relevant operations outside of your country and the EU/EEA (e.g. in the Republic of Korea, the United Kingdom or the USA) ("**Third Country**"). For some Third Countries, the European Commission has determined that they provide an adequate level of protection for Personal Data (e.g. the Republic of Korea, the United Kingdom), which also includes the USA to the extent that the receiving company in the USA participates in the EU-U.S. Data Privacy Framework (<https://www.dataprivacyframework.gov>) ("**Adequate Jurisdictions**").

Where we transfer Personal Data to a recipient that is located in a Third Country that has not been determined an Adequate Jurisdiction, we (or our Processors in the EU/EEA that transfer Personal Data to sub-processors in such Third Countries, as applicable) provide appropriate safeguards by way of entering into data transfer agreements adopted by the European Commission (standard contractual clauses) with the recipients or taking other effective measures to provide an adequate level of data protection. A copy of the respective safeguards may be requested from us or our DPO (see Section 2 and Section 3).

## **10. DATA RETENTION**

Your Personal Data is stored by us for no longer than is necessary for the purposes for which the Personal Data has been collected as set out above. When we no longer require 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 are required to retain the Personal Data to comply with legal or regulatory obligations to which we are subject; for example, Personal Data contained in contracts, communications and business letters may be subject to statutory retention requirements).

The retention period may be extended in accordance with national laws when Processing is necessary for the establishment, exercise or defence of legal claims, and where we or third parties have a corresponding legitimate interest (e.g. for the period of impending legal (administrative and/or judicial) proceedings and for the duration of such legal proceedings, including the expiration periods of any recourse).

## **11. YOUR LEGAL RIGHTS**

Subject to applicable law, you may have the following rights regarding the Processing of your Personal Data:

- the right not to provide your Personal Data to us (however, please note that we will be unable to provide you with the full benefits of the Kia App and the Kia App Services if you do not provide us with your Personal Data (e.g. we might not be able to Process your requests without the necessary details));
- the right to request access to, or copies of, your Personal Data, together with information regarding the nature, Processing and disclosure of this Personal Data;
- the right to request rectification of any inaccuracies in your Personal Data;
- the right to request, on legitimate grounds: (i) erasure of your Personal Data; or (ii) restriction of Processing of your Personal Data;
- the right to have certain Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the Processing of your Personal Data with a Data Protection Authority (i.e. for the UK, the Information Commissioner's Office (<https://ico.org.uk/>) or for the EU, the Data Protection Authority for the EU Member State in which you live, or in which you work, or in which the alleged infringement occurred (see the list here: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en))).

**Subject to applicable law, you may also have the following additional rights regarding the Processing of your Personal Data:**

- **the right to object, on grounds relating to your particular situation, to the Processing of your Personal Data by us or on our behalf, where such Processing is based on Articles 6(1)(e) (public interest) or 6(1)(f) (legitimate interests) of the GDPR; and**
- **the right to object to the Processing of your Personal Data by us or on our behalf for direct marketing purposes.**

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Kia App

Privacy Notice, or about our Processing of your Personal Data, please use the contact details provided in Sections 2 and 3 above. Please note that:

- in some cases it will be necessary to provide evidence of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g. determining whether any Processing is non-compliant with applicable law) we will investigate your request without undue delay before deciding what action to take.

## **12. KIA APP TERMS OF USE**

The use of the Kia App and the Kia App Services is subject to our Kia App Terms of Use, which are available here. The use of Connected Services is subject to our Kia Connect Terms of Use, which are available here: <https://connect.kia.com/uk/kia-connect-legal-document1/>. We recommend that you check these terms regularly in order to review any changes we might make from time to time.

## **13. UPDATES**

This Kia App Privacy Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Kia App Privacy Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Kia App Privacy Notice.

## **14. DEFINITIONS**

*“Controller”* means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

*“Data Protection Authority”* means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.

*“GDPR”* means (i) Regulation (EU) 2016/679 (General Data Protection Regulation); or (ii) with regard to the United Kingdom, Regulation (EU) 2016/679 as it forms part of the law of the United Kingdom by virtue of Section 3 of the European Union (Withdrawal) Act 2018 and as amended from time to time (also known as the UK GDPR).

*“Personal Data”* means any information relating to an identified or identifiable natural person.

*“Process”/ “Processing”* means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

*“Processor”* means a natural or legal person, public authority, agency or other body which Processes Personal Data on behalf of the Controller.