

Kia Connect GmbH
Kia Connect Business Solution
Privacy Notice

Last updated: Nov. 17th, 2025

1. Introduction

This privacy notice (“**B2B Customer Platform Privacy Notice**”) is issued by Kia Connect GmbH, Theodor-Heuss-Allee 11, 60486 Frankfurt am Main, Germany (“**Kia**”, “**we**”, “**us**”, and “**our**”) and is addressed to individuals that are authorised by our and/or other Kia group entities’ business customers (“**Business Customer/s**”) to use our B2B Customer Platform (“**User**”, “**you**”).

The B2B Customer Platform is a service that we provide to Business Customers. Accordingly, when we Process Personal Data about individuals that are authorised by the relevant Business Customer to use the B2B Customer Platform, we mainly Process the Personal Data as a Processor on behalf of that Business Customer.

This B2B Customer Platform Privacy Notice only applies to the limited circumstances in which we Process Personal Data as a Controller – that is where we decide the purposes and means of Processing. For more details about the Processing of your Personal Data by the relevant Business Customer, please refer to the applicable privacy notices of the Business Customer

Defined terms used in the B2B Customer Platform Privacy Notice are explained in Section 14 below.

2. Controller

Unless expressly stated otherwise, Kia is the Controller of the Personal Data Processed as set out in this B2B Customer Platform Privacy Notice. However, as referenced above, the circumstances in which Kia acts as a Controller in relation to your Personal Data in the context of the B2B Customer Platform are limited. This is because the B2B Customer Platform is a service provided to relevant Business Customers, which means that Kia mainly Processes the User’s Personal Data on behalf of the Business Customer.

If you have any questions about our Processing of your Personal Data for which Kia is the Controller, 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

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:

- 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 contact us via email, telephone, our contact form, or by any other means).

- **B2B Customer Platform data:** We collect or obtain Personal Data when you use the B2B Customer Platform.
- **Third party information** – We collect or obtain Personal Data from third parties who provide it to us (e.g. Kia dealers, Kia Connect GmbH (“**Kia Connect**”) when you register in the B2B Customer Platform using your Kia Account (B2B), Business Customers).
- **Website data:** We collect or obtain Personal Data when you visit the usiness Solution or use any features or resources available on or through the usiness Solution.

5. Types of Personal Data that we Process

We Process the following types of Personal Data about you (“**Relevant Personal Data**”):

- **Kia Account (B2B) Data:** Data that relate to your Kia Account (B2B) (e.g. username; password; email address; salutations; first name; last name; [role]; [user status]; country; Unique User Identifier (“**UUID**”); mobile phone number; preferred language settings; Business Customer).
- **Contract Data:** Data that relate to the conclusion and termination of our contract with the relevant Business Customer, which you enter into with us on behalf of the Business Customer (including information about the acceptance and termination of contract and the date and time of acceptance).
- **Consent Records:** Records of any consents 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 form the content of communication (e.g. content of conversations, written correspondence).
- **Technical Data:** Technical information that relates to the device or software on the device used to visit the B2B Customer Platform (e.g. IP address, language settings, time stamps, UUID, device data (e.g. device type, operating system), browser type; browser settings; cookies).
- **Usage Data:** Records of your interactions with content on the B2B Customer Platform and available services (visited sections; time of access; access of content).
- **Views and Opinions:** any views and opinions that you choose to share, such as feedback and responses to surveys.

6. Purposes of Processing and Legal Bases for Processing

The purposes for which we Process the Relevant Personal Data as a Controller, subject to applicable law, and the legal bases on which we perform such Processing are set out in this Section below.

To the extent that we Process the Relevant Personal Data for the provisioning of the B2B Customer Platform and related services as set out in our agreement (the “**Kia Business Soution Terms of Use**”) with the relevant Business Customer, this is not referenced in this Section as we do not Process such data as a Controller but as a Processor on behalf of the Business Customer. For more details, please refer to the Kia Business Solution Terms of Use, which are available here <https://connect.kia.com/eu/business/legal/b2b-portal>.

6.1. Visiting and Using the B2B Customer Platform

When you visit and use the usiness Solution, certain technical information will be Processed automatically, which is necessary for the provision of the B2B Customer Platform. Such information is Processed by us for the purposes of: (i) providing the Business Customers and you with the usiness Solution and its features; (ii) preventing and/or remedying malfunctions of the

B2B Customer Platform; and (iii) protecting the IT systems used to provide the B2B Customer Platform.

Relevant Personal Data: Technical Data; Usage Data.

Legal bases: The Processing is necessary for the purpose of our legitimate interests (Art. 6 (1) f) GDPR). Our legitimate interests are: delivering appropriate, error-free and secure services, including the B2B Customer Platform.

6.2. Communication

We Process your Personal Data to communicate with you via several communication channels (e.g. email, telephone). When you submit a request with us, we Process your Personal Data to handle your request.

Relevant Personal Data: Kia Account (B2B) Data; Contract Data; Communication Data.

Legal basis: The Processing is necessary for the purpose of our legitimate interests (Art. 6 (1) f) GDPR). Our legitimate interests are: performing the contract that we have entered into with the Business Customers, providing the best possible service to Business Customers and appropriately answering and processing the Business Customers' and their Users' requests.

6.3. Direct Marketing

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

Your consent is voluntary and can be withdrawn at any time. You may also unsubscribe from our promotional email 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.

Relevant Personal Data: Kia Account (B2B) Data, Contract Data, Communication Data, Consent Records, Technical Data.

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); or it is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: promoting our services and products.

6.4. Feedback and Surveys

You may be invited to provide your feedback and/or participate in surveys relating to our products and services or the products and services of other Kia group entities.

If you provide your feedback or participate in our surveys, we may Process Relevant Personal Data for the purpose of processing and evaluating the feedback or conducting, processing and evaluating the survey. This is in order to improve products and services of Kia group entities and adapt them to Business Customers' needs.

In some cases, surveys are conducted by using 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 survey related information on our behalf and for our purposes. Furthermore, Momentive may: (i) collect and Process information about your device and other technical data to avoid multiple participations; 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: Kia Account (B2B) Data; Technical Data; Usage 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 products and services or the products and services of other Kia group entities.

6.5. Operation of Business

We may Process Relevant Personal Data for internal management and administration purposes, including record management or maintaining other internal protocols.

Relevant Personal Data: Kia Account (B2B) Data; Contract Data; Consent Records; Communication Data; Technical Data.

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

6.6. 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).

Relevant Personal Data: Kia Account (B2B) Data; Technical Data.

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.

6.7. Legal Proceedings and Investigations

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

Relevant Personal Data: Kia Account (B2B) Data; Contract Data; Consent Records; Communication Data; Technical Data.

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

7. Disclosure of Personal Data to Third Parties

The B2B Customer Platform allows Users of a Business Customer to activate additional services for that Business Customer, including services provided by other Kia group entities (e.g. Kia Connect's services 'Fleet Management Service', and 'Kia Charge'). When you activate such a third party service, we will share your Personal Data (in particular, Kia Account (B2B) Data and Contract Data) with such third party. This data sharing is part of our services provided to the relevant Business Customer, which means that we share the data as a Processor solely on the instructions of this Business Customer, which is the Controller in relation to this sharing of the data.

Furthermore, we disclose Relevant Personal Data to other entities within the Kia group, for legitimate business purposes and the operation of the B2B Customer Platform, in accordance with applicable law. We also disclose Relevant Personal Data to other entities within the Kia group in cases, in which 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 regulation;
- accountants, auditors, consultants, lawyers and other outside professional advisors to us, subject to binding contractual or legal obligations of confidentiality;
- third party Processors (such as providers for the technical infrastructure and maintenance services relevant to the B2B Customer Platform);
- 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 execution 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).

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.

When you register on the B2B Customer Platform, our platform may display a questionnaire from Kia Connect in an embedded window (iframe). Upon completion of this questionnaire, we will share your Kia Account (B2B) Data with Kia Connect so they can link your responses to you and the Business Customer which you represent. The questionnaire is operated directly by Kia Connect from their own systems, which means that they act as an independent Controller for your responses and the Personal Data that we share with them in that context. The questionnaire relates to details about the Business Customer that you represent and will allow Kia Connect to tailor their services to the Business Customer. We share the data mentioned above for the purpose of the legitimate interests pursued by Kia Connect (Art. 6 (1) f) GDPR). Kia Connect's legitimate interests are: tailoring and improving services provided to Business Customers.

8. 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).

9. Data Retention

Your Personal Data are stored by us for no longer than is necessary for the purposes for which the Personal Data have 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; e.g. 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 we or third parties have a corresponding legitimate interest (e.g. for the period of impending legal (administrative and/or judicial) procedures and for the duration of such legal proceedings, including the expiration periods of any recourse).

10. Your Legal Rights

Subject to applicable law and to the extent that we Process your Personal Data as a Controller, 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 the relevant Business Customer with the full benefit of the B2B Customer Platform, if you do not provide your Personal Data);
- the right to request access to, or copies of, your Personal Data, together with information regarding the nature, Processing and disclosure of those 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. in relation to the UK, the Information Commissioner's Office (<https://ico.org.uk/>) or in relation to 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](#))).

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 Art. 6 (1) e) (public interest) or Art. 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 B2B Customer Platform 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. a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

11. Updates

This B2B Customer Platform 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 B2B Customer Platform Privacy Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this B2B Customer Platform Privacy Notice.

12. 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 Regulation (EU) 2016/679 (General Data Protection Regulation).

“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, adaption 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.