

Kia I Pleos Fleet Driver App (“Kia Driver App”)

Privacy Notice

Last updated: Nov.17th, 2025

1. INTRODUCTION

This privacy notice (“**Kia I Pleos Fleet Driver 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 Driver App (“Kia App Services”), we will Process Personal Data relating to you as further set out in this Kia I Pleos Fleet Driver App Privacy Notice. Defined terms used in the Kia I Pleos Fleet Driver App Privacy Notice are explained in Section 14 below.

Please note that in addition to the Kia I Pleos Fleet Driver 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.

2. CONTROLLER

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

If you have any questions about the Kia I Pleos Fleet Driver 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

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 Driver App.
- **Third party information:** We collect or obtain Personal Data from third parties who provide it to us (e.g. suppliers of third-party services) and from the Kia national sales company or distributor in your country in relation to the usage 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 Driver 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 driven mileage; 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).
- **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.
- **Technical Data:** Technical information that relates to your device or software in your device used for accessing and connecting with the Kia Driver 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.
- **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 DRIVER APP

When you download the Kia Driver 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 Data 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 Driver 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.

– **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 Driver App, if you are not actively using the Kia App); and/or (ii) push notifications.

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

6.3. GENERAL USE OF THE KIA DRIVER APP

When you access and use the Kia Driver App, certain technical information that is necessary for the provision and use of the Kia Driver 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 Driver 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 Driver App, you need to have a “Kia Account”, sign up to the Kia Driver App using your Kia Account login details and accept the Kia Driver 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 and using user-friendly features and functions in the Kia Driver App.

6.5. KIA APP SERVICES

We Process Personal Data about you when you use the Kia App Services, such as

Driver Profile / Identity

1. When a driver logs into the App, they select which vehicle they are driving, so their trips are associated with their identity
2. Drivers may need to provide: name, contact details, and driver's license number
3. Logbook reporting, the Kia Driver App keeps a log of driving duty status, which is tied to a specific driver.

Telematics / Vehicle Data

4. If you use a hardware dongle, certain telematics data is being collected: d, engine data, accelerometer, etc. (this is the “vehicle-generated data”). Some of this data is personal data because it can be linked to a driver.
5. In “Personal Mode” engine / accelerometer data is being collected

6. Private driving data (when Personal Mode is enabled) is stored in the database marked as “private”.
7. In case of an accident, private data can be extracted for reconstruction, subject to additional legal requirements

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 Driver 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 Driver App Terms of Use or this Kia Pleaos Diver 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 Driver App will be pre-filled to make using the contact form more convenient for you. 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: providing the best possible service to our customers and appropriately answering and Processing our customers' requests.

6.6.2. 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.

6.6.3. 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.

6.6.4. 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.

6.6.5. 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.

6.6.6. WEB ANALYSIS AND OPTIMISATION

We Process certain Personal Data for the purpose of evaluating the use of the Kia Driver App and its functions by the Kia Driver App users, and to compile reports on the Kia Driver 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 Driver App, and compile information relating to the use of the Kia Driver App in a user profile. This will help us to identify: (i) the times during which the Kia Driver App, its functions and/or content are most frequently accessed and used; and (ii) the parts or areas of the Kia Driver 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

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 Driver App efficiently and providing it securely.

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

8. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

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 Driver App and the Kia Pleos Driver 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 anonymize 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)).

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 DRIVER APP TERMS OF USE

The use of the Kia App and the Kia App Services is subject to our Kia Driver 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 Driver 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 Driver 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 Driver 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 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, 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.