

Kia Connect
Kia I Pleos Fleet
Privacy Notice

Last updated: Nov, 17th, 2025

1. Introduction

This privacy notice ("**FMS Privacy Notice**") is issued by Kia Connect GmbH ("**Kia Connect**", "**we**", "**us**", and "**our**") and is addressed to individuals that are authorised by business customers (e.g. fleet companies) of Kia Connect and/or other Kia group entities ("**Business Customer/s**") to subscribe to and/or use our fleet management system service (together: "**User**", "**you**").

Our Kia I Pleos Fleet ("**FMS**") is a service that is provided by us to Business Customers that have signed up to this service. The FMS is designed to support Business Customers with the optimisation, monitoring and management of their fleet operations through data-driven insights, real-time tracking, and configurable reporting tools subject to our agreement (the "Terms & Conditions for Kia I Pleos Fleet"), which is available here <https://connect.kia.com/eu/business/legal/fms/>. Accordingly, we mainly Process the Personal Data that is collected by us or shared with us in connection with the use of the FMS as a Processor on behalf of the relevant Business Customer.

This FMS 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 FMS Privacy Notice are explained in Section 1 below.

2. Controller

Unless expressly stated otherwise, Kia Connect is the Controller of the Personal Data Processed as set out in this FMS Privacy Notice. However, as referenced above, the circumstances in which Kia Connect acts as a Controller in relation to the Personal Data Processed in connection with the FMS are limited as the provisioning of the FMS is a service provided to Business Customers, which means that Kia Connect mainly Processes your Personal Data as a Processor on behalf of the Business Customer.

If you have any questions about our Processing of your Personal Data for which Kia Connect 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:

- 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 data is collected in connection with other services and transmitted to the FMS (e.g. Kia Connect Connected Services), when you enter information in the FMS, or when you contact us via email, telephone, our contact form, or by any other means).
- **FMS Data:** We collect or obtain Personal Data when you use the FMS.
- **Third party information:** We collect or obtain Personal Data from third parties who provide it to us (e.g. Business Customers, Kia group entities or Kia dealers).

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; 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 (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).
- **Position and Movement Data:** Data that relate to the position and/or movement of the relevant Business Customer’s vehicles (e.g. location data (GPS data)).
- **Technical Data:** Technical information that relates to devices or software in the relevant Business Customer’s vehicle or other devices used for or in connection with the FMS (e.g. IP address, SIM card information, telecom carrier information, navigation device information, language settings time stamps, UUID, mobile device data (e.g. device type, OS version), app version logfiles).
- **Usage-based Data:** Data that is generated through the use of the vehicle or the FMS or created in relation the interaction with the FMS (e.g. date, time and duration of service address, stop-off and/or point of interest information; route information, connectivity data).

- **Pseudonymised Identifiers:** Generated IDs that are used in connection with other data about Users or drivers of the relevant Business Customer's vehicles, but which cannot be attributed directly to an individual without the use of additional information (e.g. user ID, vehicle ID, device ID)).
- **Trips/ Overall Driving Information:** Data that relate to trips made with the relevant Business Customer's vehicles (e.g. mileage driven, maximum speed, average speed, distance; fuel, battery and/or power consumption; driving date and time, driving patterns, acceleration/deceleration information; idle engine time).
- **Vehicle Data:** Vehicle identification number ("VIN"), and information on manufacturing date, first registration date, vehicle registration number, date of last inspection, inspection due date, vehicle software version, features and configurations of your vehicle (e.g. engine/battery, brake, powertrain, gears, consumption, air conditioning, heating, warning and assistance systems, steering, tyres, speed, technical and stability-related systems, Head Unit).
- **Vehicle Status Information:** Data that relate to the status of the relevant Business Customer's vehicles (e.g. odometer status, heating, ventilation and air conditioning status; defrost status; engine status; doors, boot, windows, bonnet and sunroof status; tyre status; lamp status; hazard lights status; smart key status; washer fluid and brake/engine oil status; charging information; ignition status; gear status; seat status; battery, fuel and distance to empty status; battery conditioning status; diagnostics data; vehicle status alert type).
- **Charging Data:** Data referring to the charging activities (e.g. in connection with Kia Charge service), such as state of charge, energy consumption or charging fees.

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 FMS to 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 Terms & Conditions for Fleet Management System.

6.1. Using the FMS

When you use the FMS, certain technical information will be Processed automatically, which is necessary for the provision of the FMS. Such information is Processed by us for the purposes of: (i) providing the Business Customers and you with the FMS; (ii) preventing and/or remedying malfunctions of the FMS; and (iii) protecting the IT systems used to provide the FMS.

Relevant Personal Data: Technical Data, Pseudonymised Identifiers.

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

6.2. Communication

We Process your Personal Data to communicate with you via several communication channels (e.g. email, telephone) in relation to the FMS. 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. 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.

6.4. 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).

Relevant Personal Data: Kia Account (B2B) Data, Contract Data, Consent Records, Communication Data, Position and Movement Data, Technical Data, Usage-based Data, Pseudonymised Identifiers, Trips/ Overall Driving Information, Vehicle Data, Vehicle Status Information.

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.

6.5. 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, Pseudonymised Identifiers.

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. 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 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

In accordance with our agreement with the relevant Business Customer, we may share Relevant Personal Data with Kia group entities or third parties as authorised by the relevant Business Customer (in particular Geotab Inc., 2440 Winston Park Drive Oakville, Ontario L6H 7V2, Canada and Moove Connected Mobility GmbH, Prinzenallee 7, 40549 Düsseldorf, Germany). Please note that we share the Personal Data as a Processor on behalf of the relevant Business Customer, which means that the relevant Business Customer is the Controller for the sharing of Relevant Personal Data.

Furthermore, we disclose Relevant Personal Data to other entities within the Kia group, for legitimate business purposes and the operation of the FMS, in accordance with applicable law. In addition, we may 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 FMS; in particular Geotab Inc., 2440 Winston Park Drive Oakville, Ontario L6H 7V2, Canada and Moove Connected Mobility GmbH, Prinzenallee 7, 40549 Düsseldorf, Germany);
- 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.

9. International Transfer of Personal Data

We are a member of an international group of companies. Therefore, we may transfer Relevant Personal Data within the Kia group and to other third parties as noted in Section 7 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, Canada 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, Canada), 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 Relevant 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 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).

11. 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 FMS, 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 FMS 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.

12. Updates

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

13. 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.