

Kia Charge (B2B)
Privacy Notice**Last updated: [19.11.2025]****1. Introduction**

This privacy notice ("**Kia Charge B2B 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 ("**Business Customer/s**") to subscribe to and/or use the service Kia Charge (B2B) via the Kia Charge (B2B) web portal (together: "**User**", "**you**").

Kia Charge (B2B) is a service that is provided to the relevant Business Customer as set out in our services agreement with the Business Customer (the "**Kia Charge Terms of Service**"), which is available here [\[https://connect.kia.com/eu/business/legal/kia-charge/\]](https://connect.kia.com/eu/business/legal/kia-charge/). Accordingly, when you use Kia Charge (B2B) as an authorised user of the Business Customer, we mainly Process the Personal Data that is shared with us in connection with the use of the service as a Processor on behalf of the Business Customer.

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This Kia Charge B2B 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 Business Customer, please refer to the applicable privacy notices of the Business Customer.

Defined terms used in the Kia Charge B2B Privacy Notice are explained in Section 12 below.

2. Controller

Unless expressly stated otherwise, Kia Connect is the Controller of the Personal Data Processed as set out in this Kia Charge B2B Privacy Notice. However, as referenced above, the circumstances in which Kia Connect acts as a Controller in relation to Kia Charge(B2B) Personal Data are limited as the provisioning of the Kia Charge (B2B) 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

You may also contact us at [\[info@kia-connect.eu\]](mailto: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 provide information during the registration process, or when you contact us via email, telephone, our contact form, or by any other means).

Privacy Notice
Kia Charge (B2B)
November 2025

- **Kia Charge (B2B) Data:** We collect or obtain Personal Data when you use the Kia Charge (B2B) service.
- **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; [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, Contact Form Data).
- **Position and Movement Data:** Data that relate to the position and/or movement of User's vehicles and/or devices (e.g. user location data, vehicle location data, charge point location data (GPS data)).
- **Payment and Invoicing Data:** Data that relate to bank transfers, financial statements, credit card data, invoices and payment status.
- **RFID Card or Key Fob Data:** Data that relate to the RFID cards and/or key fobs used for Kia Charge (B2B).
- **Technical Data:** Technical information that relates to devices or software in User's vehicle or other devices used for or in connection with Kia Charge (B2B) (e.g. IP address, time stamps, UUID, mobile device data (e.g. device type, OS version), app version, logfiles).
- **Usage-based Data:** Data that is provided through interaction with the vehicle and Kia Charge (B2B) or generated through the use of the vehicle or Kia Charge (B2B) (e.g. date, time and duration of service; charging session start/stop; charging point operator information; public charging point of interest information (e.g. latitude, longitude, address, availability); charging data record).
- **Vehicle Data:** Vehicle identification number ("**VIN**"), relevant vehicles' software version, features and configurations.
- **Vehicle Status Information:** Data that relates to the status of User's vehicles (e.g. charging information).

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 Kia Charge (B2B) service 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 Kia Charge Terms of Service.

6.1. Using Kia Charge (B2B)

When you use the Kia Charge (B2B) service, certain technical information will be Processed automatically, which is necessary for the provision of the service. Such information is Processed by us for the purposes of: (i) providing the Business Customers and you with the Kia Charge (B2B) service; (ii) preventing and/or remedying malfunctions of the Kia Charge (B2B) service; and (iii) protecting the IT systems used to provide the Kia Charge (B2B) service.

Relevant Personal Data: RFID Card or Key Fob Data, Technical Data.

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 Kia Charge (B2B) (for example, for sending you a welcome email). 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; RFID Card or Key Fob Data; Position and Movement Data; Technical Data; Usage-based 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; Communication Data; Position and Movement Data; RFID Card or Key Fob Data; Technical Data; Usage-based Data; 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; Position and Movement Data; RFID Card or Key Fob Data; Technical Data; Usage-based Data, Vehicle Data, Vehicle Status Information.

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.

6.6. Direct Marketing

We Process Relevant Personal Data to contact you via email, messages or notifications within the Kia App, the Head Unit of your vehicle or other communication formats to provide you with promotional information regarding the Connected Services, 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 and to the extent required under applicable law.

You may give your consent by activating the respective consent button in the consent list of the Kia App, Kia Charge (B2B) 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 button in the consent list of the Kia App).

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.

If you provide us with your email address as part of signing up to Kia Charge (B2B), address and without prejudice to your right to object under Section 11, we may send you information about similar services or products to the relevant email address without asking you for your prior specific consent.

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 or Kia Charge (B2B) to the inbox. However, you have the right to opt out from 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 of the Kia App or Kia Charge (B2B)).

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. In addition, you also 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 of the Kia App or Kia Charge (B2B), we may also obtain consent from you on behalf of an affiliated Kia entity in Europe 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.

INTERNAL ONLY

Privacy Notice
Kia Charge (B2B)
November 2025

In relation 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 consent that we have obtained from you on behalf of the relevant Kia entity, in addition to de-activating the respective consent button in the Kia App or Kia Charge (B2B), you may also directly contact the relevant Kia entity for the withdrawal of your consent.

Relevant Personal Data: Personal Details, Contact Details, Consent Records, Position Data, Vehicle Data, Pseudonymized Identifiers, 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 ("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.

6.7. Feedback and Surveys:

From time to time, we may invite you to provide your feedback and/or participate in surveys relating to us and our services, including support services.

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 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") (see Section 15 for more details about these providers).

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 recognize 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/>.

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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.

7. Disclosure of Personal Data to Third Parties

In accordance with our agreement with the relevant Business Customer, when you use Kia Charge (B2B), we may share Relevant Personal Data with Kia group entities or third parties as authorised by the relevant Business Customer (in particular, Deftpower B.V., Westervoortsedijk 73, 6827 AV Arnhem, The Netherlands ("Deftpower") and charge point operators (i.e. third parties that are responsible for the installation, operation and service of charging stations). 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 Kia Charge (B2B), 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 payment service, customer service, technical infrastructure and maintenance services relevant to Kia Charge (B2B), including Deftpower);
- 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.

Please note that we may also share Relevant Personal Data with Deftpower, which they may Process to generate anonymised and aggregated statistical data for the purposes of internal research and service development, conducting statistical analysis as well as identifying trends and insights. In such case, we share the Relevant Personal Data with Deftpower as an independent Controller and Deftpower will Process such data for the referenced purposes as an independent Controller. For more details, please refer to Deftpower's privacy notice, which is available at [<https://www.deftpower.com/privacy-policy>]. The sharing of the Relevant Personal Data is necessary for the purpose of Deftpower's legitimate interests (Art. 6 (1) f) GDPR). Their legitimate interests are improving their products and services.

8. 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 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**").

Field Code Changed

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).

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 Kia Charge (B2B), 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](#))).

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