

IN-CAR PAYMENT - PRIVACY NOTICE

CONTENTS

CLAUSE

PAGE

1. [INTRODUCTION](#)
2. [CONTROLLER, CONTACT INFORMATION](#)
3. [DATA PROTECTION OFFICER](#)
4. [PURPOSES, LEGAL BASES AND CATEGORIES OF PERSONAL DATA](#)
5. [PROCESSING FOR PROVISION OF IN-CAR PAYMENT](#)
6. [OTHER PROCESSING ACTIVITIES](#)
7. [RECIPIENTS AND CATEGORIES OF RECIPIENTS](#)
8. [CROSS-BORDER DATA TRANSFER](#)
9. [DATA RETENTION](#)
10. [DATA SECURITY](#)
11. [YOUR RIGHTS](#)
12. [AUTOMATED DECISION MAKING, INCLUDING PROFILING](#)
13. [UPDATES](#)
14. [DEFINITIONS](#)

1. INTRODUCTION

This privacy notice ("**Privacy Notice**") of Kia Connect GmbH, registered under the registration number HRB 112541, ("**Kia**", "**we**" or "**us**") applies to the collection and processing of personal data in connection with the provision of In-car Payment and is addressed to our customers using In-car Payment ("**you**", "**your**").

Kia takes the protection of your personal data and your privacy very seriously and will process your personal data only in accordance with the GDPR and other applicable data protection and privacy laws. Please note that, in addition to this Privacy Notice, where appropriate, we may inform you about the processing of your personal data separately, for example in consent forms or separate privacy notices.

2. CONTROLLER, CONTACT INFORMATION

2.1. Unless expressly stated otherwise, Kia Connect GmbH is the controller of the personal data collected and processed in connection with the provision of In-car Payment.

2.2. If you have any questions about this 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

You may also use our contact form, which is available here: <https://connect.kia.com/eu/customer-support/contact-form/>

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

3. DATA PROTECTION OFFICER

We have appointed 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. PURPOSES, LEGAL BASES AND CATEGORIES OF PERSONAL DATA

Details about the purposes of and the legal bases for our processing of your personal data, and the categories of personal data that we may process, are set out in Sections 5 and 6 below.

Please note that we will process personal data only to the extent permitted by law and to the extent necessary for the relevant purpose.

4.1. Purposes

We will mainly process your personal data for the provision of In-car Payment, i.e. to allow you to initiate the purchase of certain goods and services from the respective merchants of these goods and services by using the Head Unit's user interface in your vehicle. Further details about In-car Payment can be found in the In-car Payment Terms of Use.

Furthermore, we may also process your personal data for the purpose of complying with applicable laws or other legal obligations (e.g. disclosure of relevant personal data to courts or criminal prosecution authorities), or if we have separately informed you about such purposes.

4.2. Legal bases

Generally, in connection with the provision of In-car Payment, we collect and process your personal data (i) to take steps at your request prior to entering into a contract ("conclusion of contract"), or (ii) to the extent necessary for the performance of a contract with you. This may be the contract between you and us regarding the use of In-car Payment or the contract you concluded with the respective merchant using In-car Payment (Art. 6 (1) b) GDPR. We may also process your personal data to the extent to which the processing is necessary for the purposes of our or a third party's legitimate interests (Art. 6 (1) f) GDPR). With respect to certain processing activities, we may process your personal data to the extent necessary for compliance with a legal obligation to which we are subject (Art. 6 (1) c) GDPR), or where we have obtained your prior consent to the relevant processing of your personal data for a specific purpose (Art. 6 (1) a) GDPR).

4.3. Sources

Unless otherwise expressly stated in this Privacy Notice, the personal data listed in Sections 5 and 6 below are provided to us directly by you (e.g. by entering certain personal data in the Kia Connect App / Kia App or in the Head Unit of your vehicle).

4.4. Your right to not provide your personal data

Generally, you have the right to not provide your personal data to us. However, in some cases, we may require certain personal data from you to be able to process your enquiry or to provide the relevant services (e.g. if you wish to use parking services via In-car Payment, you will need to provide your vehicle registration number so the parking service provider can identify the vehicle for which the parking fees are paid using In-car Payment). We will inform you about the required personal data accordingly.

5. PROCESSING FOR PROVISION OF IN-CAR PAYMENT

In-car Payment is a service offered via your vehicle's Head Unit and is also integrated in the Kia Connect App / Kia App. To use In-car Payment, you must first register for In-car Payment. This can be done within your Kia Connect App / Kia App.

5.1. Registering for In-car Payment

Before you can use In-car Payment, you need to register for the Service within the Kia Connect App / Kia App. In the course of the registration, you will be asked to accept the In-car Payment Terms of Use and to acknowledge this Privacy Notice. You can also set a PIN that will have to be entered in the car before a purchase can be made.

After the initial registration steps, you need to complete the following steps:

5.1.1. Link a vehicle to In-car Payment

You need to select the vehicle in which you want to use the In-car Payment account for which you have just registered. In the course of the vehicle linking process, you will be asked to enter the vehicle's vehicle registration number and country of registration.

5.1.2. Select a payment method from Kia Pay

As In-car Payment uses Kia Pay, you also need to register for Kia Pay (if you have not done so before) and select a payment method from Kia Pay for use with In-car Payment.

If you register for In-car Payment but do not yet have a Kia Pay account, or no payment method has been registered in Kia Pay, you will be guided through the Kia Pay registration process.

Registration and use of Kia Pay is governed by the Kia Pay Terms of Use and Kia Pay Privacy Notice.

For this purpose, the following categories of personal data are processed: The vehicle's vehicle registration number and country of registration; the PIN you chose; the selected payment method from Kia Pay, the merchants you selected for use with In-car Payment; your acceptance of the In-car Payment Terms of Use and acknowledgement of the In-car Payment Privacy Notice.

Legal basis: The processing is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR) for the provision of In-car Payment.

5.2. Selecting and enabling cooperating merchants for use with In-car Payment

In-car Payment allows you to purchase goods and services from merchants that cooperate with Kia to make their goods and services available via In-car Payment (such as car park operators or their service providers, toll service providers etc.). As the goods and services are provided under direct contracts between you and the merchant, it is up to you to choose which merchants you want to use with In-car

Payment. When enabling the use of a cooperating merchant, you must accept the respective merchant's Terms of Use and acknowledge the merchant's Privacy Notice.

For this purpose, the following categories of personal data are processed: Your acceptance of the respective merchant's Terms of Use and acknowledgement of the merchant's Privacy Notice.

Legal basis: The processing is necessary for the conclusion and performance of the contract that you enter into with the respective merchant when purchasing any of the merchant's products using In-car Payment (Art. 6 (1) b) GDPR).

5.3. Using In-car Payment

When you use In-car Payment, Kia processes and in particular stores the details of the purchases you make as well as information on past purchases made as provided by the merchant in order to display an order history.

In order for the merchant to be able to initiate payment using the payment method you selected from Kia Pay, the token of the selected payment method will be transmitted to the merchant and further to the merchant's payment service provider for payment processing.

The further data processed (and forwarded to the merchant) depends on the respective goods or service you purchase.

For this purpose, the following categories of personal data are processed: When you initiate a purchase with a merchant, the data processed depends on the specific product or service you purchase using In-car Payment.

If you purchase a parking ticket, we will process (and transmit to the merchant) the following data: Location of the car park, your vehicle registration number and country of registration, parking start time, parking end time (in case of payment on departure) or parking duration selected (in case of payment on arrival). Please see the merchant's terms of use for details on the data processed by the merchant for provision of the respective goods and service.

In any case we will process and transfer to the merchant the token of the selected payment method.

In order to provide the purchase history, we process information on the goods/services purchased (such as car park location, purchase price and date of purchase).

Legal basis: The processing of the order information is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR) for the provision of In-car Payment. Forwarding of the details on the products/services purchased and the payment token is necessary for the performance of the contract that you enter into with the respective merchant when purchasing any of the merchant's products using In-car Payment (Art. 6 (1) b) GDPR).

6. OTHER PROCESSING ACTIVITIES

In addition to the processing activities set out in Section 5 above, we may also process your personal data for the following purposes:

6.1. Communication

We may process your personal data to communicate with you about In-car Payment or the contract that you have entered into with us (e.g. to provide customer support, to inform you about technical issues with In-car Payment, to perform our contractual obligations or to inform you about changes to the In-car Payment Terms of Use or this Privacy Notice) via several communication channels, including email, telephone and notifications within the Kia Connect App / Kia App (the Kia Connect App / Kia App features a separate inbox for this purpose). When you contact us via available communication channels (e.g. via the contact form on our website or in the Kia Connect App / Kia App, or via email or telephone), we may process your personal data to handle your request and to communicate with you accordingly as regards to your request. Certain fields in the contact form in the Kia Connect App / Kia App will be pre-filled to make using the contact form quicker and easier for you.

For this purpose, the following categories of personal data are processed: Contact details (e.g. email address, telephone number), data relevant for the sending of the notifications within the Kia Connect App / Kia App (user ID, country, language, device ID, system token, platform, UUID, contact ID), data relevant for pre-filling the contact form in the Kia Connect App / Kia App (email address, vehicle identification number (VIN), language, UUID), name, information provided by you in relation to the relevant request, contract 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), or for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: providing the best possible service for our customers and appropriately answering and processing our customers' requests.

6.2. Feedback and surveys

From time to time, we may invite you to provide your feedback and/or participate in surveys relating to In-car Payment, including support services (see Section 6.1 above for details about our communication with you). 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. We may engage third party providers to conduct such surveys; please see Section 7 and Annex "Recipients" below for more details about these providers.

To participate in surveys, 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 the supplier, where the survey will be conducted. The supplier will process the survey-related information on our behalf and for our purposes. Furthermore, the supplier 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 reassign any responses that the relevant participant has already given. More information about the respective supplier's processing of personal data is available on the supplier's website.

For this purpose, the following categories of personal data are processed: Name (if relevant and provided), content data (e.g. your feedback and/or responses), technical data (IP address, UUID, operating system version, device type, device ID/MAC address, system, performance information, browser type).

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.

6.3. Data sharing

Details about our sharing of your personal data with third parties are provided in Section 7 below.

6.4. Operation of business

We may process certain categories of the personal data referred to above for internal management and administration purposes, including record management or maintaining other internal protocols.

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.

6.5. Legal compliance

We may process certain categories of the personal data referred to above (e.g. records of any consents that you have given, together with the date and time, as well as content and means of consent) 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 may be 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. Legal proceedings and investigations

We may process certain categories of the personal data referred to above 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.

7. RECIPIENTS AND CATEGORIES OF RECIPIENTS

Any access to your personal data at Kia is restricted to those individuals that have a need to know to fulfil their job responsibilities.

Kia may disclose your personal data for the respective purposes and in compliance with applicable data protection laws to the recipients and categories of recipients listed below:

- **Merchants** – We may disclose such personal data you provided in the context of In-car Payment to the respective merchant from which you purchased (or intend to purchase) goods or services via In-car Payment. The merchants may forward the data to further recipients (such as their respective payment processors). Please see the respective merchant's Privacy Notice for more detailed information.

For a list of merchants currently offering their services for purchase via In-car Payment, please see the **Annex "Recipients", Part I "Merchants"**.

- **Service providers** – We may disclose your personal data to certain third parties, whether affiliated or unaffiliated, that process such data as our service providers on our behalf under appropriate instructions as processors and as necessary for the respective processing purposes (Art. 28 (3) GDPR). These processors are subject to contractual obligations, which require them to implement

appropriate technical and organisational security measures, to safeguard the personal data, and to process the personal data only in accordance with our instructions.

Please find a list of Service providers in the **Annex “Recipients”, Part II “Service Providers”**.

- **Governmental authorities, courts, and similar third parties that are public bodies** – We may disclose your personal data to governmental authorities, courts, and similar third parties that are public bodies where we have a legal obligation to do so (Art. 6 (1) c) GDPR), or for the purpose of protecting our interests or enforcing our rights (Art. 6 (1) f) GDPR). These recipients will process the relevant personal data as independent controllers.
- **Outside professional advisors** – We may disclose your personal data to our tax consultants, auditors, accountants, legal advisors and other outside professional advisors for the purpose of operating our business (Art. 6 (1) f) GDPR). In some cases, we may also disclose the data for the purpose of protecting our interests or enforcing our rights (Art. 6 (1) f) GDPR). These recipients will usually process the relevant personal data as independent controllers.
- **Third-party acquirers** – In the event that we sell or transfer all or any relevant portion of our assets or business (including reorganisation or liquidation), we may disclose your personal data to third-party acquirers (Art. 6 (1) f) GDPR). These recipients will process the relevant personal data as independent controllers.

8. **CROSS-BORDER DATA TRANSFER**

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 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 United States of America) (“**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) (“**Adequate Jurisdictions**”).

Where we transfer personal data to a recipient that is located in a Third Country which has not been designated as 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 by 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 data protection officer (see Section 2 and Section 3 above).

9. **DATA RETENTION**

Your personal data is stored by Kia and/or our service providers for no longer than is necessary for the purposes for which the personal data is collected, and which are 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 relevant 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, which may require retention for up to 10 years).

10. **DATA SECURITY**

We have implemented appropriate technical and organisational security measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful forms of processing.

However, as the internet is an open system, the transmission of data via the internet is not completely secure. While we constantly improve our security measures in line with technical developments and in order to ensure an appropriate level of security for any of your personal data that we process, we cannot guarantee the security of your data transmitted to us using the internet.

11. **YOUR RIGHTS**

Where we process your personal data on the basis of your **consent**, you have the right to withdraw your consent at any time (Art. 7 (3) GDPR). The withdrawal of your consent will not affect the lawfulness of processing based on such consent before its withdrawal.

Subject to applicable law, you may have the following rights regarding the processing of your personal data: The right to obtain access to your personal data (Art. 15 GDPR), the right to have your personal data rectified (Art. 16 GDPR), the right to have your personal data erased (Art. 17 GDPR), the right to have the

processing of your personal data restricted (Art. 18 GDPR), the right to data portability (Art. 20 GDPR) and the right to object to the processing of your personal data (Art. 21 (1) and (2) GDPR). You also have the right to lodge a complaint with the competent data protection authority (Art. 77 GDPR). Please note that these rights could be subject to certain limitations under applicable GDPR provisions or local data protection laws.

11.1. Right of access

You have the right to obtain from us confirmation as to whether we process personal data concerning you, and, where that is the case, to request access to the personal data and certain additional information. Such information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipients to whom the personal data has been or will be disclosed. However, please note that the interests of other individuals may restrict your right of access. You have the right to obtain a copy of the personal data processed by us. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

11.2. Right to rectification

You have the right to obtain from us the rectification of inaccurate personal data concerning you. Subject to the relevant purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

11.3. Right to erasure (“right to be forgotten”)

Under certain circumstances, you may have the right to request from us the erasure of personal data concerning you and we may have the obligation to erase such personal data.

11.4. Right to restriction of processing

Under certain circumstances, you may have the right to obtain from us restriction of processing of your personal data. In this case, the respective data will be flagged accordingly and may be processed by us only for certain purposes.

11.5. Right to data portability

Under certain circumstances, you may have the right to receive the personal data concerning you which you have provided to us. If the legal prerequisites are met, then we will provide the data in a structured, commonly used, and machine-readable format, and you may have the right to transmit this data to another controller without hindrance from us.

11.6. Right to Object

Under certain circumstances and where the processing is based on legitimate interests (art. 6 (1) f) GDPR), you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we may be required to no longer process your personal data. Furthermore, where your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.

12. AUTOMATED DECISION MAKING, INCLUDING PROFILING

Kia does not make any decisions based on algorithms or other automated processing that have significant consequences for you.

13. UPDATES

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

We will publish the updated Privacy Notice in the Head Unit, on our websites and in the In-car Payment section of the Kia Connect App / Kia App. The date of the last update is mentioned at the top of this 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.

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

“**personal data**” means any information relating to an identified or identifiable natural person.

“**process**”/ “**processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, 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.

Last updated: 5th September 2024

Annex Recipients

Part I

Merchants

	Recipient	Business purpose	Transfer mechanism
1	Parkopedia Limited 232 Sladepool Farm Road Birmingham, West Midlands B14 5EE United Kingdom	Provision of purchased goods or services (or those where purchase is planned) via In-car Payment, including forwarding of data to further recipients (such as their respective payment processors)	Adequacy decision per Art. 45 GDPR

Part II

Service providers

	Recipient	Service provided by recipient	Transfer mechanism
1	Bluewalnut Co. Ltd. 3, Gukhoe-daero 66-gil Yeongdeungpo-gu Seoul Republic of Korea	Provision of technical infrastructure and maintenance services relevant to In-car Payment	Adequacy decision per Art. 45 GDPR
2	salesforce.com Germany GmbH Erika-Mann-Strasse 31-37 80636 Munich Germany	Customer data management platforms and connected car data management platforms	n/a
3	Amazon Web Services EMEA SARL 38 avenue, John. F. Kennedy L-1855 Luxembourg Luxembourg (with their servers located within the EU/EEA)	Customer data management platforms and connected car data management platforms	
4	Momentive Europe UC Second Floor, 2 Shelbourne Buildings Shelbourne Road Dublin 4 Ireland	Provision of online survey tool SurveyMonkey and related services for the purpose of conducting and evaluating surveys	n/a
5	Kia Connect GmbH's affiliated entities in the EU/EEA	Provision of services relating to customer support, including call centre services	n/a

Valid from 23rd of April 2025