

KIA CONNECT STORE – PRIVACY NOTICE

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1. INTRODUCTION

This privacy notice (the “**Privacy Notice**”) is issued by Kia Connect GmbH, registered under the registration number HRB 112541, (“**Kia**”, “**we**” or “**us**”) and is addressed to the visitors and users of our Kia Connect Store (“**you**”, “**your**”). On the Kia Connect Store, you can select and purchase certain additional features, such as upgrades or other add-ons to the software of your Kia vehicle (“**Upgrades**”), for use with your Kia vehicle. When you visit the Kia Connect Store and when you select and purchase Upgrades, we will process personal data relating to you as set out in this Privacy Notice.

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 your visit to and use of the Kia Connect Store.

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. 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 this data is provided to us (e.g. where you contact us via email, telephone, our contact form, or by any other means).
- **Kia Account data** – When you access the Kia Connect Store via the Kia Connect app, we obtain personal data from your Kia Account and the Kia Connect profile.
- **Relationship data** – We collect or obtain personal data in the ordinary course of our relationship with you (e.g. when you purchase an Upgrade).
- **Website data** – We collect or obtain personal data when you visit the Kia Connect Store or use any features or resources available on or through the Kia Connect Store.

5. CATEGORIES OF PERSONAL DATA THAT WE PROCESS

We process the following categories of personal data about you:

- **Personal Details:** given name(s);
- **Contact Details:** correspondence address; telephone number; email address.
- **Demographic Information:** salutation; title; language preferences.
- **Vehicle Details:** vehicle identification number (VIN); model.
- **Consent Records:** records of any consents you have given, together with the date and time, means of consent, and any related information (e.g. the subject matter of the consent).
- **Purchase Details:** records of purchases and prices; records of purchased Upgrades; order confirmation(s); order number; target model; purchase date; trial period information; end of use date; information about completed payment(s); information about the acceptance of the Kia Connect Terms of Use and acknowledgement of the Kia Connect Privacy Notice.

- **Technical Data:** device type; operating system; browser type; IP address; dates and times of connection to the Kia Connect Store; time zone; URL of the referring website; data volume transmitted; UUID.
- **Kia Account Data:** Personal Details; Vehicle Details; Contact Details; Demographic Information.
- **Kia Connect App Data:** user ID; country; language; device ID; system token; UUID, contact ID.
- **Communication Data:** information provided to us by you in connection with your requests, feedback, or responses provided in surveys.
- **Usage Data:** records of your interactions with our content on the Kia Connect Store (visited web pages; time of access; access of content).

6. PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING

The purposes for which we process the categories of personal data identified in Section 5 above, subject to applicable law, and the legal bases on which we perform such processing are as follows:

6.1. VISITING THE KIA CONNECT STORE

When you visit the Kia Connect Store, your web browser will automatically transmit Technical Data to our web server. The Technical Data will be captured in log files for the following purposes: (i) to enable the communication between your web browser and our web browser; (ii) to understand the use of the Kia Connect Store; (iii) to make the Kia Connect Store secure and to maintain availability and functionality of the Kia Connect Store.

For this purpose, the following categories of personal data are processed: Technical Data.

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: the appropriate and efficient operation of the Kia Connect Store, to make the Kia Connect Store secure, and to maintain availability and functionality of the Kia Connect Store.

6.2. USE OF THE KIA CONNECT STORE

To use the Kia Connect Store, you must have created a Kia Account. Details about our processing of your personal data in connection with the Kia Account are provided in a separate privacy notice, which is accessible here:

<https://connect.kia.com/eu/kia-account-docs/>. The Kia Connect Store is a webpage, which can be accessed only via the Kia Connect app. When you access the Kia Connect Store via the Kia Connect app, your Kia Account Data will be transmitted from the Kia Connect app to the Kia Connect Store. Furthermore, we will create and store time-limited access keys in our systems and on your device until you log out, so that you do not need to separately register with or log in to the Kia Connect Store.

For this purpose, the following categories of personal data are processed: Kia Account Data; time-limited access keys.

Legal basis: The processing of the Kia Account Data 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). The processing of the time-limited access keys is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). Our legitimate interests are: to ensure the operation and functionality of the Kia Connect Store and to verify the user of the Kia Connect Store.

6.3. PURCHASE PROCESS

You can select Upgrades on the Kia Connect Store and submit an order relating to the relevant Upgrade accordingly. We will then confirm receipt of the order through an automatic email sent to you (order confirmation). Please note that the contract for the purchase of the relevant Upgrade is concluded only once the Upgrade has been activated in the respective vehicle for which the Upgrade was purchased. As part of the purchase process, you will need to accept the *Kia Connect Terms of Use* and confirm that you have taken note of the *Kia Connect Privacy Notice*. In the *Kia Connect Privacy Notice* you will find information – inter alia – about our processing of your personal data in connection with the installation and use of the relevant Upgrade. The *Kia Connect Privacy Notice* is accessible here: <https://connect.kia.com/eu/downloads>. Furthermore, you will have the option to give your consent that Kia shall commence performance of the contract before the end of the withdrawal period (as set out in the *Kia Connect Store* and Section 5.5.2 of the *Kia Connect Terms of Use*).

For this purpose, the following categories of personal data are processed: Personal Details; Contact Details; Demographic Information; Vehicle Details; Consent Records; Purchase Details.
Legal basis: The processing 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).

6.4. PAYMENT PROCESS

The payment process will be carried out using Kia Pay. Information about our processing of your personal data in connection with the payment process is provided in the *Kia Pay Privacy Notice*, which is accessible here: <https://connect.kia.com/eu/downloads-kiapay>. The payment process and the use of Kia Pay are subject to the *Kia Pay Terms of Use*, which are accessible here: <https://connect.kia.com/eu/downloads-kiapay>.

6.5. MANAGING YOUR UPGRADES

The Kia Connect Store enables you to manage your Upgrades. As such, you will be able to see a summary of any Upgrades purchased for your vehicle, including details about trial periods, purchase dates, end of use dates and the status of the relevant Upgrades.

For this purpose, the following categories of personal data are processed: Vehicle Details; Purchase Details.
Legal basis: The processing is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR). The legitimate interests are: providing a high level-service to our customers and enabling our customers to gain an overview of purchased Upgrades through convenient means.

7. OTHER PROCESSING ACTIVITIES

In addition to the processing activities set out in Section 6 above, we may also process your personal data for the following purposes:

7.1. COMMUNICATION

We may process your personal data to communicate with you in relation to your use of the Kia Connect Store or the contract that you have entered into with us (e.g. to provide customer support, to inform you about technical issues with the Kia Connect Store, to perform our contractual obligations, to inform you about changes to this Privacy Notice) via several communication channels, including email, telephone, and notifications within the head unit of your vehicle and the Kia Connect app (for this purpose, the Kia Connect app provides a separate inbox).

When you contact us via available communication channels (e.g. contact form on our website or in the Kia Connect app, email, or telephone), we may process your personal data to handle your request and communicate with you accordingly in relation to your request. Certain fields in the contact form in the Kia Connect app will be pre-filled to make using the contact form more convenient for you.

For this purpose, the following categories of personal data are processed: Personal Details; Contact Details; Demographic Information; Kia Connect App Data; Communication 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.

7.2. FEEDBACK AND SURVEYS

From time to time, we may invite you to provide your feedback and/or participate in surveys relating to the Kia Connect Store, including support services (see Section 7.1 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 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 9 below 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 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/>.

For this purpose, the following categories of personal data are processed: Personal Details (if relevant and provided); Technical Data; Communication Data.

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.

7.3. DATA SHARING

Details about our sharing of your personal data with third parties are provided in Section 8 below.

7.4. OPERATION OF BUSINESS

We may process personal data for internal management and administration purposes, including record management or maintaining other internal protocols.

For this purpose, the following categories of personal data are processed: Personal Details; Vehicle Details; Consent Records; Purchase Details; Technical Data.

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.

7.5. LEGAL COMPLIANCE

We may process any of the categories of personal data referred to in Section 5 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.

7.6. LEGAL PROCEEDINGS AND INVESTIGATIONS

We may process any of the categories of personal data referred to in Section 5 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.

8. COOKIES

When you visit the Kia Connect Store, we may use cookies and process-related information for the purposes set out below.

“**Cookies**” are small text files that may be stored on your device (e.g. computer; smartphone) when you visit a website using your web browser or other software applications. 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 and Usage Data.

We use strictly necessary cookies to make the Kia Connect Store work, to 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 Connect Store efficiently and providing it securely.

In addition, you will find more information about cookies and their use on the Kia Connect Store in our Cookie Policy.

9. 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:

- **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. Our service providers include:

- The service provider for the technical infrastructure and maintenance services relevant to the Kia Connect Store, which is Hyundai Autoever Europe GmbH, Kaiserleistraße 8a, 63067 Offenbach am Main, Germany.
- The service providers for our customer data management platforms and connected car data management platforms, which are salesforce.com Germany GmbH, Erika-Mann-Strasse 31-37, 80636 Munich, Germany, and Amazon Web Services EMEA SARL, 38 avenue, John. F. Kennedy, L-1855, Luxembourg, with their servers located within the EU/EEA.
- The service provider Momentive Europe UC, Second Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin 4, Ireland, which provides the online survey tool SurveyMonkey and related services for the purpose of conducting and evaluating surveys.
- Kia Corporation, 12 Heolleung-ro, Seocho-gu, Seoul, 06797, Republic of Korea and our affiliated entities in the EU/EEA, which provide services relating to customer support, including call centre services.
- The service provider for the web analysis tool Google Analytics, which is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.
- The service provider of the cookie consent management tool OneTrust, which is OneTrust Technology Limited, 82 St John Street, Farringdon, London, EC1M 4JN, United Kingdom.
- **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.

10. 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 9 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 (see <https://www.dataprivacyframework.gov/>) (“**Adequate Jurisdictions**”).

Where we transfer personal data to a recipient that is located in a Third Country which 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 data protection officer (see Section 2 and Section 3 above).

11. DATA RETENTION

We take every reasonable step to ensure that your personal data is processed only for the minimum period necessary for the purposes set out in this Privacy Notice.

The criteria for determining the duration for which we will retain your Personal Data are as follows:

(i) We will retain personal data in a form that permits identification only for as long as

- we maintain an ongoing relationship with you; or
- your personal data is necessary in connection with the lawful purposes set out in this Privacy Notice, for which we have a valid legal basis,

plus

(ii) the duration of

- any applicable limitation period under applicable law (i.e. any period during which any person could bring a legal claim against us in connection with your personal data, or to which your personal data is relevant); and
- an additional two (2) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any personal data that is relevant to that claim),

and

(iii) in addition, if any relevant legal claims are brought, we continue to process personal data for such additional periods as are necessary in connection with that claim.

During the periods noted in paragraph (ii) above, we will restrict our processing of your personal data to storage of, and maintaining the security of, the data, except to the extent that the data needs to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (i), (ii) and (iii) above, each to the extent applicable, have concluded, we will either

- permanently delete or destroy the relevant personal data; or
- anonymize the relevant personal data.

12. DATA SECURITY

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

However, because the internet is an open system, the transmission of data via the internet is not completely secure. Although we will implement all reasonable measures to protect your personal data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is performed at your own risk, and you are responsible for ensuring that any personal data that you send to us is sent securely.

13. 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.

Furthermore, under applicable data protection law, you may have the right to: obtain access to your personal data (Art. 15 GDPR), have your personal data rectified (Art. 16 GDPR), have your personal data erased (Art. 17 GDPR), have the processing of your personal data restricted (Art. 18 GDPR), data portability (Art. 20 GDPR) and to object to the processing of your personal data (Art. 21 (1) and (2) GDPR).

You have the right to lodge a complaint with the competent data protection authority (Art. 77 GDPR). The following data protection authority is responsible for Kia: Der Hessischebeauftragte für Datenschutz und Informationsfreiheit. Gustav-Stresemann-Ring 1, 65189 Wiesbaden, Germany.

Please note that these rights could be subject to certain limitations under applicable local data protection laws. Furthermore, you have the right not to provide your personal data to us.

13.1. RIGHT OF ACCESS

You may have the right to obtain from us confirmation as to whether personal data concerning you is processed, 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 may have the right to obtain a copy of the personal data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

13.2. RIGHT TO RECTIFICATION

You may 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.

13.3. RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN")

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

13.4. RIGHT TO RESTRICTION OF PROCESSING

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

13.5. 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, 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.

13.6. 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.

13.7. YOUR RIGHT NOT TO PROVIDE YOUR PERSONAL DATA

You have 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 Connect Store and the related 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).

14. AUTOMATED DECISION-MAKING, INCLUDING PROFILING

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

15. 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 on our websites and on the Kia Connect Store. The date of the last update is mentioned at the top of this Privacy Notice.

16. 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.