

**ALLDAYENERGY**

**PRIVACY NOTICE**

Version: June 2026

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**1. INTRODUCTION**

- 1.1 This privacy notice (the “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 the AllDayEnergy services (the "Services") through the Kia App and is addressed to our customers using these Services (“you”, “your”).
- 1.2 The processing of personal data in connection with the provision of the Kia Connect services via the vehicle's infotainment system and the Kia App, as well as the processing of personal data in connection with the registration of the underlying Kia Account (including personal data such as your name, your email address, your date of birth, your

mobile phone number) are subject to separate privacy notices. These can be found at <https://connect.kia.com/eu/downloads/>

- 1.3 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 the AllDayEnergy services.
- 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](mailto: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](mailto: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 4.2, 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 of our processing of personal data**

We will mainly process your personal data for the provision of the AllDayEnergy services, i.e., to calculate a charging schedule which allows you to charge your vehicle at times when this is most cost-effective. Further details about the AllDayEnergy services can be found in the AllDayEnergy 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 for our processing of personal data in general**

Generally, in connection with the provision of the AllDayEnergy services, we collect and process your personal data in order to take steps at your request prior to entering into a contract (“conclusion of contract”) or to the extent necessary for the performance of our contract with you (Art. 6 (1) b) GDPR), or 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 of personal data we process**

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 App) or on your behalf by your electricity supplier when you link your account with your electricity supplier to the Services.

We obtain supplemental data, namely the applicable dynamic rate under your energy supply contract as well as relevant price signals (such as wholesale prices, imbalance price forecasts, network charges and ancillary market incentives) and site-specific factors

(such as solar and household load forecast) from your electricity supplier or from the European Power Exchange (EPEX).

#### **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 (e.g., to consider your planned departure time when calculating a charging schedule), we may require certain personal data from you to be able to process your enquiry or to provide the Services. We will inform you about the required personal data accordingly. If you do not provide the respective data, we cannot provide the Services as intended for which this data is required.

### **5. PROCESSING IN CONNECTION WITH THE PROVISION OF THE ALLDAYENERGY SERVICES AND YOUR USE OF THE SERVICES**

The AllDayEnergy services offer you uni-directional smart charging (V1X) as described in the AllDayEnergy Terms.

Use and provision of the services involves processing of personal data as follows:

#### **5.1 Flex-based smart charging**

The flex-based smart charging functionality serves to calculate and implement an optimized charging schedule for the electric vehicle(s) linked to your account. The charging schedule is calculated based on site-specific factors, electricity market signals, weather data and grid constraint data in combination with the data you enter in the Kia App, namely your desired trip start time, the desired minimum state of charge to start smart charging and the desired target state of charge at the start of the trip. The flex-based smart charging service controls the start and end times of the charging session using the Kia Connect services when the vehicle is connected to your electric vehicle supply equipment (EVSE, also called EV Charger).

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

- *Electric vehicle data*, namely electric vehicle model, VIN, state of charge, battery capacity, state of current battery capacity, remaining range, charging state (charging in progress, charging stopped, charging complete), plug status (connected, disconnected), remaining charging time to reach target battery level, real time charging power;
- *Charging preferences and settings in the Kia App*, namely the desired departure time and desired (minimum and target) state of charge of the vehicle's battery at the desired departure time;

- *Electricity supply data*, namely the details of the electricity supplier used and the electricity tariff scheme provided by your electricity supplier (if applicable under your electricity supply contract) as well as electricity market signals and grid constraint data;
- *Location data*, namely (i) the GPS-based location of the vehicle and (ii) address details, which are used to determine your home charging location, i.e., your street address, postal code, city and country;
- *Identity information*, namely first name, surname, nickname, email address and an encrypted version of your self-chosen password;
- *Kia Account data*, which is used to establish a connection between the Kia App and the electric vehicle using the Kia Connect back-end systems, namely the model of the vehicle and the VIN as well as the Kia Account ID, the access tokens used to authorize access of the EVSE and the AllDayEnergy service to the Kia Connect back-end systems.

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

## 5.2 Charging History; billing and saving calculation

Our services allow you to view information about your past charging sessions controlled by the Services. The information displayed includes the amount of electricity charged and the costs incurred; aggregated by month or year, as an average value per charging session or as a total for the selected time period.

For this purpose, the following categories of personal data are processed: Date and timestamp when a charging session started and ended, charging location, amount of electricity charged, the related costs, and a non-binding estimate of your savings (if applicable). These data are provided to us by your energy supplier for display in the Kia App; Kia has no control over the accuracy of the information.

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

## 5.3 Sign up for the Services

### 5.3.1 Sign-up process for the AllDayEnergy Services, linking of vehicle(s)

To use the Services, you need to sign up and create an account ("Kia Account") (if you do not yet have a Kia Account already).

Note: The Kia Account is also required for registering for other services provided by other Kia group members. 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/>.

In order to use the Services, you also have to sign up for the Services themselves. The option to sign up for the Services is only displayed in the Kia App when you have registered a compatible vehicle in the Kia App. In addition, your acceptance of the AllDayEnergy Terms of Use is required and you have to link one of the vehicles controlled by the Kia App to the Services.

For this purpose, the following categories of personal data are processed: Vehicle identification number (VIN) of the vehicle to be linked, email address, name, password, salutation, mobile number, country, preferred language, verification PIN, car ID, activation code, the fact that you accepted the AllDayEnergy Terms of Use.

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).

#### 5.3.2 Linking of compatible energy supplier with your Kia Account

To use the Services, you must establish a link between the Services and the account you have with your energy supplier. This is possible only when you have a contract with a compatible electricity supplier and have subscribed to a compatible electricity tariff.

For this purpose, the following categories of personal data are processed: Your client ID with the compatible electricity supplier and your Kia account ID.

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. 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 in relation to the AllDayEnergy services or the contract that you have entered into with us (e.g., to send you e-mails about the status of your registration with the AllDayEnergy services, to provide customer support, to inform you about technical issues with the AllDayEnergy services, to perform our contractual obligations, to inform you about changes to the

AllDayEnergy Terms of Use or this Privacy Notice) via several communication channels, including email, telephone, and notifications within the Kia App.

When you contact us via available communication channels (e.g., via a contact form on our website or in the Kia App, by email or by telephone), we may process your personal data to handle your request and communicate with you accordingly in relation to your request.

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 App (User ID, country, language, device ID, platform), data relevant for pre-filling the contact form in the Kia App (email address, language), 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 Marketing**

We may contact you via email and/or notifications within the Kia App to provide you with promotional information regarding our products and/or services, to ask you to participate in surveys, or to provide your feedback.

In relation to emails and notifications within the Kia App, this is usually subject to your prior consent and to the scope of such consent. You may give your consent by activating the respective consent button in the consent list of the Kia App 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. You also have the right to object to the processing of your personal data for direct marketing purposes (see Section 11.6 below for more details).

If you provide us with your email address as part of signing up to the Services and unless you have objected, we may send you information about similar AllDayEnergy 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. However, you have the right to opt out from receiving such email marketing at any time without incurring any costs (other than the transmission costs according to the basic rates). 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. You also have the right to object to the processing of your personal data for direct marketing purposes (see Section 11.6 below for more details).

For this purpose, the following categories of personal data are processed: Name, contact details (e.g., email), technical data (e.g., device information, IP address, User ID, UUID), information about your consent (e.g., date and time of opt-in).

Legal basis: The processing is based on your prior consent (Art. 6 (1) a) GDPR; Sec. 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; Sec. 7 (3) UWG). Our legitimate interests are: promoting our services and products.

### **6.3 Data Sharing**

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

### **6.4 Product improvement and development**

Kia collects telematics data relating to the performance, use, operation, and condition of the vehicle and the charging sessions from the vehicle and/or the Kia App for the purpose of product improvement and development. Kia may transfer this data to its affiliated companies so they can also process the data for these purposes and for the product improvement and development of the Kia App and/or the Services. Kia may also anonymize the data mentioned in this Section 6.4 and pass it on in anonymized form to non-affiliated third parties.

For this purpose, the following categories of vehicle-related personal data are processed: VIN, battery data (voltage, current, minimum/maximum temperature, remaining energy/state-of-health), state of charge, charge plug connection status, charge mode/DC voltage level, charging/discharging state, charge/discharge amount, use of fast charging, state of the on-board charger (temperature values, charging/discharging amounts), activation state of the V2G functionality, distance driven, driving range, vehicle status (driving, parking, charging including time stamps when the respective status started), GPS locations and event time, ambient temperature and window wiper status (including rain sensor type and status), and vehicle error codes.

With regard to product improvement and development of the Kia App, the following categories of Kia App-related personal data are processed: type of mobile device and application version, time zone setting and location, browser types and versions, operating system and platform of the device(s) you use to access the Services, and tracking data, which is used to improve our service and includes information we or others collect about

you through cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.

The data used for this purpose is either (i) anonymized or (ii) limited to technical data on the basis of which the relevant team members cannot identify a natural person as soon as practically feasible in light of the respective product improvement and development activities.

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: improvement of the Services and the Kia App, and the development of new products and services; e.g., to determine technical faults, analyse vehicle performance or provide improved products or customer services.

## **6.5 Establishing warranty policies**

Kia aims to provide its customers with long-lasting and reliable vehicles and strives to support the reliability and durability with corresponding warranties. In order to monitor the vehicles' product lifecycle and to establish adequate and realistic warranty policies, Kia and its affiliated companies may process specific electric vehicle data. Kia may also anonymize the data mentioned in this Section 6.5 and pass it on in anonymized form to third parties.

For this purpose, the same categories of vehicle-related data that are used for product improvement and development (see Section 6.4 above) may be processed.

Legal basis: The processing is necessary for the purpose of the legitimate interest pursued by us (Art. 6 (1) f) GDPR). Our legitimate interest is the analysis of the vehicle status over its life cycle for establishing adequate warranty policies.

## **6.6 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.

## **6.7 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.

## 6.8 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:

- **Kia group companies** – We may disclose your personal data to other companies that are members of the Kia group, including our affiliated companies in Europe and Kia Corporation in the Republic of Korea.
  - We may also disclose such data because it is necessary for the performance of our contract with you (Art. 6 (1) b) GDPR).
  - To the extent that we disclose such data to other members of the Kia group for internal administrative purposes, such disclosure is necessary for our operational and business interests (Art. 6 (1) f) GDPR).
  - Furthermore, in some cases, the disclosure may be based on your consent (Art. 6 (1) a) GDPR). Where you give such consent, 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.
- **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 AllDayEnergy services, which is **Kaluza, Ltd.**, having its registered office at 69 Notting Hill Gate, London, W11 3JS, United Kingdom ("Kaluza").

Kaluza provides the technical back-end system for the Services and is responsible for the technical and organisational aspects of the provision of the Services. This includes the integration of the electricity suppliers, as well as computing the charging schedules.

In its capacity as an infrastructure provider for the AllDayEnergy platform, Kaluza acts as a data processor in the sense of Art. 28 GDPR on behalf of Kia Connect GmbH. Kia provides the Services and Kia App in its own name and determines the specifications thereof.

For this purpose, Kaluza processes the data mentioned in Sections 5.1, 5.2 and 5.3.2.

- The service provider for **customer support** with regard to the AllDayEnergy services, which is **Kia Connect GmbH**, having its registered office at Theodor-Heuss-Allee 11, 60486 Frankfurt am Main, Germany. Depending on the specific field for which support is required, Kia Connect GmbH has commissioned further sub-processors which are also bound by a processing agreement.

General first level support as well as routing of the inquiries to other support providing entities will be provided by **Bosch Service Solutions GmbH**, having its registered office at Mainzer Landstraße 193, 60326 Frankfurt am Main, Germany ("Bosch").

As far as the issue concerns the Kia App, Eligible hardware (EVs + Chargers), Connectivity (Kia Connect subscription) or the Terms of Use or the Privacy Notice, first-level customer support will be provided directly by Bosch.

As far as the issue is energy contract related, concerns OVO billing or credit or service (un)subscription, the issue will be handled by **OVO Energy Limited**, 1 Rivergate, Temple Quay, Bristol, BS1 6ED, United Kingdom

If second- and third-level support is required, the lower-level support teams may contact the technical service provider Kaluza (see previous bullet point), or **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.
- Our **affiliated entities in the EU/EEA**, which provide services relating to customer support, including call centre services.
- **Independent third parties working towards stabilizing the power grid** – We may disclose your personal data to third parties contributing to stabilizing the power grid. This involves in particular transmission of the location of your charge point, the energy meter number, and the charging results to **Kaluza, Ltd.**, having its registered office at 69 Notting Hill Gate, London, W11 3JS, United Kingdom ("Kaluza"), in its role as an independent controller for providing individual EVs or groups of EVs as electric loads to help balance the power grid. We (or Kaluza) may also transfer this data onward to other parties involved in ensuring the stability of the power grid (such as Balancing Service Providers or grid operators). This data transfer and subsequent processing is based on the overarching interest (and our interest to contribute in this regard) to ensure the stability of the electric grid in times of increasing (temporarily high) loads such as EVs or heat pumps and increasingly volatile availability of electric energy due to the use of solar or wind energy (Art. 6 (1) f) GDPR). The recipients will process the relevant personal data as independent controllers.
- **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 Jurisdiction**”).

Where we transfer personal data to a recipient that is located in a Third Country which has not been determined to be 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).

## 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 it (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 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 based on 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 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 local data protection laws.

### 11.1 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.

## **11.2 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.

## **11.3 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.

## **11.4 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 only be processed by us 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, 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 on our websites and in the 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); and/or (ii) the UK GDPR as defined by section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018, as amended from time to time.

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

“**process**” / “**processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

“**processor**” means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

## Local law amendments

### I. United Kingdom (UK)

For users in the UK, the content below supplements or varies the privacy notice above.

Any references in the privacy notice above to Germany-specific laws or other local German requirements apply only to users in Germany. This includes the reference to German law set out in Section 6.2.

#### 1 Disclosure to provide personal data to public authorities

In Section 6.7 and Section 7, to the extent relevant an additional lawful basis which may be relied upon under UK GDPR is Article 6(1)(ea) UK GDPR.

#### 2 Cross-border data transfer

In respect of transfers from the UK, some of the recipients may be located or have relevant operations outside of the UK (e.g., in the EU/EEA, Republic of Korea, or the United States of America) (“Third Country”). For some Third Countries, the UK Government has determined that they provide an adequate level of protection for personal data (e.g., the Republic of Korea, the EU/EEA) (“Adequate Jurisdiction”).

Where we transfer personal data to a recipient that is located in a Third Country which has not been determined to be 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 and/or as a matter of UK law as applicable ("standard contractual clauses") with the recipients or taking other effective measures to provide an adequate level of data protection.

#### 3 What if you have a complaint?

You have the right to complain to us about our processing of your personal data, if you consider that we have breached the UK GDPR. To make a complaint about how we’ve handled your information, contact us via [dpo@kia-connect.eu](mailto:dpo@kia-connect.eu). We will acknowledge the complaint within 30 days and investigate the complaint in accordance with our legal obligations.

If you’re not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the UK data protection regulator (currently, the Information Commissioner’s Office). Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: +44 (0)303 123 1113

Website: <https://ico.org.uk/make-a-complaint/>