

Hyundai Connected Mobility GmbH
PRIVACY NOTICE - BLUELINK STORE / FEATURE-ON-DEMAND

Effective from April 2025.

Other language versions of this Privacy Notice can be accessed and downloaded from: April 2025.

1. WHAT IS THIS PRIVACY NOTICE ABOUT?

The purpose of this privacy notice ("Privacy Notice") is to inform you about the collection and processing of your personal data in connection with the provision of our Bluelink Store and is addressed to visitors and users of our Bluelink Store ("you", "your").

In the Bluelink Store, you can select and purchase Bluelink Subscriptions and certain additional features, such as feature on demand or other add-ons to the software of your vehicle (Feature on Demand "FoD") (all products and services offered in the Bluelink Store are referred to as "Bluelink Store Items"), for use with your Hyundai vehicle.

When you visit the Bluelink Store and when you select and purchase a Bluelink Store Item, we will process personal data relating to you as set out in this Privacy Notice.

We take 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. WHO IS RESPONSIBLE FOR PROCESSING MY DATA?

Hyundai Connected Mobility GmbH with its registered office in Kaiserleipromenade 5, 63067 Offenbach, Germany ("Hyundai") is the provider of the Services and responsible for the processing of your personal data as explained in this Privacy Notice.

Hyundai will be referred to as "we", "our" or "us".

We may use your personal data for the purposes described below.

3. HOW CAN I CONTACT THE CONTROLLER AND THE DATA PROTECTION OFFICER?

If you have any questions about or in connection with this Privacy Notice or the exercising of any of your rights, you may contact Hyundai's customer call centre on the phone number +49 69271472377.

You may also contact Hyundai by sending an email to bluelink@hyundai-europe.com.

Alternatively, you may also contact our data protection officer at the email address

HCM.dataprotection@hyundai-europe.com, or by writing to:

Hyundai Connected Mobility GmbH

c/o Data Protection Officer

Kaiserleipromenade 5

63067 Offenbach, Germany

4. WHAT CATEGORIES OF PERSONAL DATA ARE PROCESSED, FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS?

4.1. Bluelink Store

4.1.1. Visiting the Bluelink Store

When you visit the Bluelink Store, your web browser will automatically transmit technical data (as described below) to our web server. The technical data will be captured in log files for the following purposes: (i) to enable communication between your web browser and our web server; (ii) to help us understand how the Bluelink Store is used; (iii) to make the Bluelink Store secure and to maintain the availability and functionality of the Bluelink Store.

For this purpose, the following categories of personal data are processed: device type; operating system; browser type; IP address; dates and times of connection to the Bluelink Store; time zone; URL of the referring website; data volume transmitted; UUID.

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 Bluelink Store, to make the Bluelink Store secure, and to maintain the availability and functionality of the Bluelink Store.

4.1.2. Use of the Bluelink Store

To use the Bluelink Store, you must have created a Hyundai Account. Details about our processing of your personal data in connection with the Hyundai Account are provided in a separate privacy notice, which is accessible here: [\[add link\]](#).

The Bluelink Store is a webpage, which can only be accessed via the Bluelink app. When you access the Bluelink Store via the Bluelink app, your Hyundai Account Data will be transmitted from the Bluelink app to the Bluelink 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 register with or log in to the Bluelink Store separately.

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

- given names and contact details (correspondence address; telephone number; email address), as well as salutation; title; and language preferences, received from your Hyundai Account;
- vehicle identification number (VIN) and model;
- time-limited access keys.

The processing of the Hyundai 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 ensuring the operation and functionality of the Bluelink Store and verifying the user of the Bluelink Store.

4.1.3. Purchase process

You can select a Bluelink Store Item on the Bluelink Store and submit an order relating to the relevant Bluelink Store Item 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 Bluelink Store Item is concluded only once the Bluelink Store Item has been activated in the respective vehicle for which it was purchased.

As part of the purchase process, you will need to accept the Bluelink Terms of Use and confirm that you have taken note of the Bluelink Privacy Notice.

In the Bluelink 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 Bluelink Store Item, where applicable.

The Bluelink Privacy Notice is accessible here.

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

- given names and contact details (correspondence address; telephone number; email address), as well as salutation; title; and language preferences;
- vehicle identification number (VIN) and model;
- 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); as well as
- records of purchases and prices; records of purchased Bluelink Store Items; order confirmation(s); order number; target model; purchase date; trial period information; usage end date; information about completed payment(s); information about the acceptance of the Bluelink Terms of Use and acknowledgement of the Bluelink Privacy Notice.

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).

4.1.4. Payment process

The payment process will be carried out using Hyundai Pay. Information about our processing of your personal data in connection with the payment process is provided in the Hyundai Pay Privacy Notice, which is accessible here: [add link].

The payment process and the use of Hyundai Pay are subject to the Hyundai Pay Terms of Use, which are accessible here: [add link].

4.1.5. Managing your FoDs

The Bluelink Store enables you to manage your Bluelink Store Items, in particular FoDs. As such, you will be able to see a summary of purchases related to your vehicle, including details about trial periods, purchase dates, usage end dates and the status of the relevant Bluelink Store Item.

For this purpose, the following categories of personal data are processed: vehicle details and purchase details as specified in 4.1.3.

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 giving our customers a convenient overview of their purchases.

4.2. Communication and marketing

In addition to the processing activities set out in Section [4.1](#) above, we may also process your personal data for the following purposes:

4.2.1. Communication:

We may process your personal data to communicate with you about your use of the Bluelink 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 Bluelink 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 Bluelink app (the Bluelink app provides a separate inbox for this purpose).

When you contact us via the available communication channels (e.g. contact form on our website or in the Bluelink 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 Bluelink 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: contact details (e.g. email address, telephone number), name, information provided by you in relation to the relevant request, as well as – where relevant – information about your vehicle and purchased services.

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

4.2.2. Surveys and feedback:

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

If you provide your feedback or participate in our surveys, we may process relevant personal data for the purpose of processing and evaluating the feedback or conducting, processing, and evaluating the survey. This is to improve our services and adapt them to our customers' needs. We may engage third-party providers to conduct such surveys.

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).

The processing is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR) of improving our services based on customer feedback.

4.2.3. Processing of data for marketing purposes for similar goods and services

We may use your personal data that we obtain directly from you and when you register with our Services for the purpose of marketing our own similar products and/or services (e.g. to notify you about new services or other similar Hyundai services), unless you have objected to such use.

The legal basis for the processing is Art.6 (1) (f) GDPR (our legitimate interests to inform you and to promote our Services).

You can object to such use at any time and free of charge via the Unsubscribe link included in every communication or via the contact information provided in Section [3](#).

4.3. Other purposes of data processing

4.3.1. Operation of business

We may use your personal data as described above for internal management and administration purposes, including record management or maintaining other internal protocols.

Such 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.

4.3.2. Legal compliance, proceedings and investigations

We may also process any categories of your personal data described above 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, as well as to assess, enforce, and defend our rights and interests).

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 as well as protecting our interests and enforcing our rights.

4.4. No automated decision-making

Hyundai does not engage in automated decision-making, including profiling in connection with the Services, unless you have been expressly notified otherwise by other means.

5. COOKIES AND WEB TRACKING

When you visit the Bluelink Store, we may use cookies or similar technologies and process-related information for the purposes set out below.

When you visit a website or use an application, it may store or retrieve information about your browser, usually in the form of cookies or similar technologies such as web beacons, pixels, etc. (referred to collectively as “cookies” in the following).

This information may relate to you, your preferences, or your device, and is primarily used to make the website/application work the way you expect it to.

The information does not usually directly identify you, but it can give you a more personalised web experience. You have the right and possibility to choose not to allow some types of cookies.

Types of cookies

We classify cookies into different categories in relation to their function and purpose.

Depending on the company managing them, we may use the following types of cookies:

- **First-party cookies:** Are those which are sent to the user’s system from a system or domain managed by the editor and from which the service requested by the user is provided.
- **Third-party cookies:** Are those which are sent to the user’s system from a system or domain that is not managed by the editor but by another company processing the data obtained through the cookies.

Depending on the purpose, we may use the following types of cookies:

- **Strictly Necessary Cookies:** These cookies are necessary for the website to function and cannot be switched off in our systems.

They are usually only set in response to actions performed by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms.

You can set your browser to block or alert you about these cookies, but some parts of the site will then no longer work. These cookies do not store any personally identifiable information.

- **Performance Cookies:** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site.

They help us to know which pages are the most and least popular and see how visitors move around the site.

All information these cookies collect is aggregated and therefore anonymous.

If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance.

- **Functional Cookies:** These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages.

If you do not allow these cookies then some or all of these services may not function properly.

- **Targeting Cookies:** These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites.

They do not store directly personal information but work by uniquely identifying your browser and the device you use to access the internet. If you do not allow these cookies, you will experience less targeted advertising.

- **Social Media Cookies:** These cookies are set by a range of social media services that we have added to the site to enable you to share our content with your friends and networks.

They are capable of tracking your browser across other sites and building up a profile of your interests.

This may impact the content and messages you see on other websites you visit.

If you do not allow these cookies, you may not be able to use or see these sharing tools.

The storing of and gaining access to information on your end device, including the further processing of your personal data that has been processed by strictly necessary cookies is required to provide you with a service you have expressly requested and for the purposes of our legitimate interests (Art. 6 (1) lit. f) GDPR) in order to provide you with our website as well as to ensure system stability and efficiency and to implement proper safeguards as to the security of our website and services.

The storing of and gaining access to information on your end device, including the further processing of your personal data that has been processed by performance cookies, functional cookies, targeting cookies and social media cookies is not strictly necessary for visiting our website.

We will only store, gain access to and process your information and personal data via such cookies if you gave us your prior consent (Art. 6 (1) lit. a) GDPR).

You can set your preferences to allow all cookies, not to allow some types of cookies or reject all cookies. You can manage your consent preferences at any time by accessing the "Cookie Settings".

Here, you can click on the headings of the different categories to learn more and manage the respective settings and find further information about each cookie. However, blocking some types of cookies may affect your experience with the website and the services we offer.

5.1. Cookie Consent Management Tool OneTrust

We use the cookie consent management tool provided by OneTrust (OneTrust Technology Limited, 82 St. John Street, Farringdon, London EC1M 4 JN, United Kingdom).

With the cookie consent management tool, we offer you the possibility to consent to the storage of cookies in a legally compliant manner and to ensure the withdrawal of consent.

Furthermore, your consent is documented for legal proof and the setting of cookies is controlled by technical means. For this purpose, cookies are used, which save your cookie settings on our website.

In connection with this, we process your IP address and if consent is given, information about the browser, country, device, pseudo-anonymous browser ID, retention of given/withdrawn consent by groups/solutions with indication of the time of change in order to be able to provide legal proof of the consent given.

In this way, the cookie settings can be retained when you visit our website again, as long as you do not delete the cookies beforehand. You can adjust your settings at any time.

Your personal data is processed to offer you the possibility to consent to cookies and to document your consent, to ensure the withdrawal of consent and to manage your settings.

The data processing is based on our legitimate interest (Art. 6 (1) lit. f) GDPR) to comply with our legal obligations as well as to manage and document your consent.

5.2. Google Tag Manager

We use Google Tag Manager on our website, a service provided by Google (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (for all persons located outside of the EEA or Switzerland, the service is provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA)) to manage tags for tracking and analytics with our own and third-party software.

Tags are small code elements that help us to control which page or service elements and tools are activated and loaded in which order, among other things, to measure traffic and visitor behaviour, help us understand the impact of our advertising, set up remarketing and target group orientation, and test and optimise our website.

Google Tag Manager is an auxiliary service that makes it easier to integrate and manage our tags via an interface. The Google Tag Manager only implements tags, which means that it does not use its own cookies and does not collect any personal data itself.

It triggers other tags, which may in turn collect personal data. However, Google Tag Manager does not access this data. The data processing is based on your consent (Art. 6 (1) lit. a) GDPR).

For more information about Google and its privacy practices, please also visit the following links.

- Google's Privacy Policy: <https://policies.google.com/privacy?hl=en>
- Google's Tag Manager Use Policy: <https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/>

5.3. Google Analytics 4

We use Google Analytics 4, a web analytics service provided by Google LLC, on our website. The responsible entity for users in the EU/EEA and Switzerland is Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google").

Google Analytics 4 uses cookies that enable us to analyse your use of our websites. During your website visit, your user behaviour is recorded in the form of "events".

Events can include the following information: Page views, first visit to the website, start of session, web pages visited, your "click path", interaction with the website, scrolls (whenever a user scrolls to the bottom of the page (90%)), clicks on external links, internal search queries, interaction with videos, file downloads and ads that you have seen/clicked on.

In addition, the following information may also be recorded: Your approximate location (region), date and time of your visit, your IP address (in shortened form), technical information about your browser and the

end devices you use (e.g. language setting, screen resolution), your internet service provider and the referrer URL (via which website/advertising medium you came to this website).

Google will use this information on our behalf to evaluate your use of the website and to compile reports on website activity. The reports provided by Google Analytics 4 enable us to analyse the performance of our website.

The information collected via the cookies about your use of this website is generally transferred to a Google server in the USA and stored there.

Google Analytics 4 has IP anonymisation enabled by default.

Due to IP anonymisation, your IP address will be shortened by Google within Member States of the European Union or in other states party to the Agreement on the European Economic Area.

Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there.

According to Google, the IP address transferred by your browser as part of Google Analytics will not be merged with other Google data.

[Only if Google Signals is activated] In addition, we use Google Signals.

When you visit our website, Google Analytics records, among other things, your location, search history, YouTube history, and demographic data (visitor data).

This data can be used for personalised advertising with the help of Google Signal. If you have a Google account, Google Signal's visitor data is linked to your Google account and used for personalised advertising messages. The data is also used to compile anonymised statistics on our users' behaviour. The data sent by us and linked to cookies is automatically deleted after 2 [OR: 14 months]. The maximum lifespan of Google Analytics cookies is 2 years. Data for which the retention period has been reached is deleted automatically once a month.

The legal basis for the processing of your personal data is your consent (Art. 6 (1) lit. a) GDPR). You can revoke your consent at any time via the cookie settings.

For more information how Google processes your personal data, please also visit the following links:

- Google's privacy policy: <https://policies.google.com/privacy?hl=en>
- Google Analytics' terms of use: <https://marketingplatform.google.com/about/analytics/terms/us/> and <https://policies.google.com/?hl=en>
- Regarding the transfer of your personal data:
<https://business.safety.google/adsprocessorterms/scs/c2p/>

6. WITH WHOM IS MY DATA SHARED?

Any access to your personal data at Hyundai is restricted to those individuals that need to know it in order to fulfil their job responsibilities.

Your personal data may be transferred to the recipients and categories of recipients listed below for the respective purposes; these recipients can then process it for the specified purposes:

- Data Processors: we transmit your personal data to certain third parties, whether affiliated or unaffiliated, that process your data on behalf of Hyundai under appropriate instructions as necessary for the respective processing purposes.
- The data processors will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal data, and to process your personal data only as instructed,
- Hyundai affiliates:
- The data processor for the technical infrastructure and maintenance services relevant to the Bluelink Store, which is Hyundai Autoever Europe GmbH, Kaiserleistraße 8a, 63067 Offenbach am Main, Germany;
- The data processor for services related to customer support (including call centre services), which is Hyundai Motor Company, 12 Heolleung-ro, Seocho-gu, Seoul, 06797, Republic of Korea and our affiliated entities in the EU/EEA.
- Partners supporting the customer service processes;
- Partners providing customer data management platforms and connected car data management platforms;

- Partners supporting technical aspects of provision and maintenance of specific Bluelink Store Items, in particular FODs;
- Third parties such as market research companies, marketing agencies and lead generation companies and well as other third parties who provide us with personal data;
- The data processor for the cookie consent management tool OneTrust, which is OneTrust Technology Limited, 82 St John Street, Farringdon, London, EC1M 4JN, United Kingdom.
- Government authorities, courts and similar third parties that are public bodies as required or permitted by applicable law.
- External private third parties – we transmit your personal data to certain private entities that help us offer the Services and operate our business. This may include e.g. tax consultants, auditors, accountants, legal advisors, telecommunications providers etc. Such recipients will usually process the relevant personal data as independent controllers.

7. IS MY DATA TRANSFERRED ABROAD?

In principle, your data related to Bluelink Store is processed in the EU/EEA.

We transfer your data outside the EU/EEA to Hyundai entities located in the Republic of Korea for the purposes indicated in Section 6.

The European Commission has determined that Korea and the UK are among the jurisdictions that provide an adequate level of protection of personal data.

Some other recipients of your personal data will be located or may have relevant operations outside of your country and the EU/EEA, e.g. the United States of America (e.g. data providers' sub-processors), where the data protection laws may provide a different level of protection compared to the laws in your jurisdiction and for which an adequacy decision by the European Commission does not exist.

With regard to data transfers to such recipients outside of the EU/EEA, we provide appropriate safeguards, in particular, by entering into data transfer agreements which include standard clauses adopted by the European Commission with the recipients, or by taking other measures to provide an adequate level of data protection.

A copy of the respective measure we have taken is available via Hyundai's data protection officer (see Section 3 above).

8. HOW LONG WILL MY DATA BE STORED?

Your personal data is stored by Hyundai and/or our service providers solely to the extent necessary to meet our obligations, and only for the time necessary to achieve the purposes for which the personal data is collected, in accordance with applicable data protection laws.

When Hyundai no longer needs to process your personal data, 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 need to keep your information in order to comply with legal or regulatory obligations to which Hyundai is subject; e.g. personal data contained in contracts, communications and business letters may be subject to statutory retention requirements, which may require these items to be retained for up to 10 years).

9. WHAT RIGHTS DO I HAVE AND HOW CAN I EXERCISE THEM?

If you have given your consent to the processing of your personal data, you can withdraw your consent at any time with effect for future processing.

Such a withdrawal will not affect the lawfulness of the processing that took place prior to your withdrawal of consent.

Pursuant to applicable data protection law, you have the following rights with respect to the processing of your personal data.

Please note that these rights might be limited under the applicable national data protection law.

9.1. Right of access

You have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to your personal data.

This information includes – inter alia – the purposes of the processing, the categories of your personal data, and the recipients or categories of recipients to whom your personal data has been or will be disclosed.

However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You also have the right to obtain a copy of the personal data about you that is being processed.

For any further copies you might request, we may charge a reasonable fee based on administrative costs.

9.2. Right of rectification

You have the right to the rectification of any inaccurate personal data concerning you.

Depending on the purposes of the processing, you have the right to have incomplete personal data updated, including by means of providing a supplementary statement.

9.3. Right to erasure ("right to be forgotten")

Under certain circumstances, you have the right to the erasure of your personal data and we may be obliged to erase your personal data.

9.4. Right to restriction of processing

Under certain circumstances, you have the right to have a restriction placed on the processing of your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

9.5. Right to data portability

Under certain circumstances, you may have the right to obtain from us a copy of your personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You have the right, without hindrance from us, to transfer this data or have it transferred directly by us to another entity.

9.6. Right to object:

9.7. Under certain circumstances, you have the right to object, on grounds relating to your particular situation and at any time, to the processing of your personal data, and we will be required to no longer process your personal data.

If your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data 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.

9.8. Right to complain

You also have the right to make a complaint with the competent data protection supervisory authority in your country of origin.

10. AM I OBLIGED TO PROVIDE MY DATA?

You are under no statutory or contractual obligation to provide us with your personal data.

In addition, you do not need to provide your personal data for the conclusion of a contract. However, if you do not provide your personal data, it is possible that the usability of the Bluelink Store will be limited for you.

11. HOW CAN THIS PRIVACY NOTICE BE CHANGED?

We may change and/or supplement this Privacy Notice from time to time in the future.

Such changes and/or supplements may be necessary due to the implementation of new technologies or the introduction of new services in particular.