

# Hyundai Bluelink Europe

## Privacy Notice

Effective from 24th March 2023.

### 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 Hyundai Bluelink services ("**Services**") to you via the car's infotainment system (this is the head unit of your vehicle) and the Hyundai Bluelink app ("**App**").

We take your privacy very seriously and will only process your personal data in accordance with applicable data protection laws.

Any processing of your personal data regarding the registration of the underlying Bluelink Account (including personal data about you such as your name, email address, date of birth or mobile phone number) is subject to a separate privacy notice.

### 2. **Who is responsible for processing my data?**

Meridian Enterprises Ltd is a legal entity whose company registration number is C3988; the company's registered address is Pater House, Psaila Street, Birkirkara (the "**Distributor**"). It is responsible for the processing of your personal data as explained in this Privacy Notice. The Distributor will act as joint controller together with Hyundai Motor Europe GmbH, with its registered office in Kaiserleipromenade 5, 63067 Offenbach, Germany ("**Hyundai**"). The Distributor and Hyundai will be jointly referred to as "**we**" or "**us**".

The Distributor will provide you with guidance, e.g. by providing support services when actively using the Services, while Hyundai will manage the provision of the App and the underlying services on an organisational and technical level. Both the Distributor and Hyundai may use your personal data for other purposes as described below. The Distributor shall be the contact point for any request by data subjects concerning the processing of personal data in connection with the Services. However, you shall remain entitled to exercise your rights under the GDPR and national data protection laws in respect to and against each of the controllers.

Further company details on each of the Distributors can be taken from the respective Distributor's website.

Hyundai and the Distributor enter into an agreement governing the processing of personal data. Upon request, Distributor will provide information on the essence of such an agreement to you.

### 3. **How can I contact the controller and the data protection officer?**

- 3.1. If you have any questions about or in connection with this Privacy Notice or the exercising of any of your rights, you may contact the Distributor's customer call centre

at the phone number +356 2269 2100. You may also contact Hyundai by sending an email to [fmamo@pater.com.mt](mailto:fmamo@pater.com.mt).

- 3.2. You may also contact the data protection officer of Hyundai at:  
Email: [DPO-hyundai-europe@steep.de](mailto:DPO-hyundai-europe@steep.de)

Postal address: Data Protection Officer of Hyundai Motor Europe GmbH  
steep GmbH  
Justus-von-Liebig-Str. 18  
53121 Bonn  
Germany

#### 4. **What categories of personal data are processed, for what purposes and on what legal basis?**

##### 4.1. Our processing of your personal data

##### 4.1.1. **Provision of the Bluelink Services**

We collect and process your personal data in connection with the Services only insofar as the collection and processing is:

- necessary for the conclusion or performance of the Bluelink contract (Art. 6 (1) b) GDPR),
- where required by law (Art. 6 (1) c) GDPR),
- where based on consent (Art. 6 (1) a) GDPR), or
- where it is necessary for the purposes of legitimate interests of us or third parties (Art. 6 (1) f) GDPR).

For details on individual Services, please refer to the respective service description in the Bluelink Terms of Use.

All (personal) data described in Sections 4.2, 4.3, 4.4, 4.5 and their subsections below is collected directly from your vehicle (e.g. its sensors and related applications as made accessible through the infotainment system), or was made available by you through the App (e.g. by entering certain personal data via the App) and is processed in connection with the Services.

The data described in Sections 4.2, 4.3, 4.4 and 4.5 and their subsections below is required to provide the Services. Without this information, the Services cannot be performed.

##### 4.1.2. **Processing for other purposes**

Apart from the provision of the Services, we will also process your personal data for other purposes as described below.

- **Product improvement/development:** We will analyse and further improve the Services in order to develop new mobility-related products and/or services, to make our products more secure and/or to improve our Services. For these purposes, we automatically analyse the data collected when providing Services based on statistical and mathematical models to identify potential for improvements. More

details are provided in Section 4.5.

The legal basis for any such processing is Art. 6 (1) f) GDPR (legitimate interests of Hyundai and the Distributor to process your personal data in order to develop and improve our Services).

- **Monitoring of products / product liability:** In this context, we process your personal data in order to monitor our products, ensure sufficient IT security standards or to defend ourselves or third parties against product liability and other legal claims made with regard to our products and Services.  
Insofar as such processing is not required by law (Art. 6 (1) c) GDPR), the legal basis for any such processing is Art. 6 (1) f) GDPR (legitimate interests of Hyundai and the Distributor to process your personal data for the purposes as indicated above).
- **Other purposes:** We process your personal data for other purposes only if we are obliged to do so on the basis of legal requirements (Art. 6 (1) c) GDPR), for example when this data needs to be transferred to courts or criminal prosecution authorities, to provide certain functionalities in the car such as the “**eCall**” as based on regulation (EU) 2015/758, if you have consented to the respective processing (Art. 6 (1) a) GDPR) or if the processing is otherwise lawful under applicable law. If processing for another purpose takes place, Hyundai and/or the Distributor will provide you with additional information where appropriate.

#### 4.1.3. **No automated decision-making**

Neither Hyundai nor the Distributor engages in automated decision-making, including profiling, in connection with the Services unless you have been expressly notified otherwise by other means.

#### 4.2. Hyundai Account

The Hyundai Account is required to register for numerous services (provided by us or by cooperating third parties). The underlying processing of your personal data is necessary to enter into and to perform a contract with you (Art. 6 (1) b) GDPR) and is based on our legitimate interest to improve your customer experience by providing you with a centralised user account (Art. 6 (1) f) GDPR).

The Hyundai Account is a central user account in which you can manage your personal master data and which you can use as a single sign-on for your linked services. To use our Bluelink Services it is necessary to create a Hyundai Account or to log in with an existing Hyundai Account. In this case, the Bluelink Services will be linked to your Hyundai Account and your personal master data (your email address and mobile phone, your salutation, first and last name, your country and your preferred language) will be displayed.

For more information, please refer to the separate Privacy Notice for the Hyundai Account which can be accessed [here](#).

#### 4.3. Provision of Bluelink Services – vehicle infotainment system

##### 4.3.1. **Hyundai Live**

Hyundai Live enables you to access the following functions:

- Live traffic: Live traffic information for calculating routes, including precise arrival times and displaying the traffic situation based on your current location
- Live parking: On- and off-street parking, near current position, near the destination, near the scroll mark
- Live filling stations: Information about the nearest fuel stations and fuel prices based on your current location
- Live EV point of interest (POI) (*only for electric vehicles and plug-in hybrid electric vehicles*): Information on nearby charging stations including availability status and charger type based on your current location
- Weather: Local weather information based on your current location
- Hyundai service: Information on nearby Hyundai dealers or service locations based on your current location
- Live POI and live free text search: Information on nearby POIs based on your current location
- Camera / danger zone alerts (*if legally permissible in your country*): The system provides alerts in areas where accidents are particularly common and warns you about accident black spots or speed cameras
- Sports league: Information on results from recent sports events

The provision of our Hyundai Live Services requires the collection and processing of your Vehicle Identification Number (VIN), geolocation data (e.g. GPS coordinates for live traffic information”), the Integrated Circuit Card Identifier of your vehicle’s SIM card (ICCID) and a unique request ID for any transaction. We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.3.2. **Voice recognition**

Voice recognition enables you to use spoken commands to access and control the infotainment system and to draft and send text messages via a connected mobile device.

For this function, the following categories of personal data are processed and sent to our Bluelink cloud environment: voice recording, geolocation data (GPS coordinates), point of interest (POI) and the Cerence user ID. The latter is a unique ID for registration on the server of Cerence B.V., Netherlands, our data processor for these specific services. There is no link between the Cerence user ID and the Vehicle Identification Number (VIN) or any other identifiers, which means that Cerence B.V. cannot identify a natural person from the data transmitted to it. Once you start your vehicle, voice recognition is activated as a presetting in its online mode. We process your personal

data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

When using online voice recognition, we process your personal data in our Bluelink cloud environment. In addition, we collect voice samples and GPS coordinates and store them for up to 90 days in order to perform and improve the voice recognition service. We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR) and where related to the improvement of the Services based on our respective legitimate interests (Art. 6 (1) f) GDPR). When you use the online voice recognition function, your voice samples and GPS coordinates are processed by our service provider Cerence B.V., Olympiaweg 2 D, 1213 NT Hilversum, Netherlands (data processor) and its sub-processors, which may be located in countries outside the EU/EEA and may not provide for an adequate level of data protection.

You can deactivate online voice recognition and use the voice recognition services in an offline mode where no data is transmitted outside of your vehicle. If you do not want us to process your voice samples and GPS coordinates, you can use offline voice recognition, which does not use your voice samples and GPS coordinates to improve the voice recognition service.

#### 4.3.3. **Vehicle Diagnostics**

Vehicle Diagnostics gathers active trouble codes (i.e. the vehicle's error messages) from all control units integrated in your vehicle together with the Vehicle Identification Number (VIN). The active trouble codes and VIN will be sent to our server for further analysis. In the Vehicle Diagnostics section of the infotainment system, you can view all active trouble codes for your vehicle. We use this data to provide you with information concerning whether there is an issue with your vehicle. We process your personal data for Vehicle Diagnostics for the purpose of performing our Services (Art. 6 (1) b) GDPR).

Insofar as Meridian Enterprises Ltd or Hyundai are required to do so by law, we process your aforementioned personal data for monitoring the products and to comply with product security requirements (Art. 6 (1) c) GDPR). For information on the processing of the above data for the improvement and development of the products, see also Section 4.5 below.

#### 4.3.4. **Connected Routing**

Connected Routing allows more accurate traffic forecasting, more precise times of arrival and more reliable route recalculations by processing the relevant data on our Bluelink cloud environment instead of only on your infotainment system.

For this function, the following categories of personal data are processed and sent to our Bluelink cloud environment: your Vehicle Identification Number (VIN), geolocation data (GPS coordinates) and navigation data (e.g. real-time traffic; pattern of traffic information).

We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

##### 4.3.4.1. Route Satisfaction

Through the infotainment system we may ask you to submit your feedback in order to measure your satisfaction with our route guidance and location information. For this function, we process the same categories of personal data as in 4.3.1. as well as your satisfaction score. The legal basis for the processing of your data for these purposes is the legitimate interest of Hyundai in improving the Services (Art. 6 (1) f) GDPR).

#### 4.3.5. **OTA (Over-the-Air) Update**

OTA Updates allow you to receive wireless (“over-the-air”) software updates (“OTA Updates”) for the vehicle system as well as the map and infotainment system. Your infotainment system will regularly check whether new software versions are available and automatically download any available software updates to your vehicle and prepare the respective installation. You can choose whether you want to complete the OTA Update now or later.

You can disable this feature by turning off the toggle in the Bluelink app (“More” -> “Service List”). Alternatively, you can deactivate Bluelink connectivity via the infotainment system in your vehicle (“Settings” -> “Bluelink” -> “Deactivate Bluelink”). However, if you turn off OTA Updates, your vehicle or the services provided (such as security-related systems, infotainment system, Bluelink) may not function properly.

##### 4.3.5.1. Vehicle System OTA Update

We may provide you with OTA Updates concerning the vehicle system for various reasons and purposes, in particular to remedy a defect within the warranty period, within the scope of the manufacturer’s guarantee or for other security-related reasons.

For this purpose, the following categories of personal data are processed and sent to our Bluelink cloud environment: your Vehicle Identification Number (VIN), vehicle status information (ignition, climate, battery, front bonnet, transmission lever position, lamp, parking brake), usage history (OTA Update), diagnostic information (error codes, OTA result, software recovery result) and software version information (electronic control unit). We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

Please also refer to the “Appendix: Data Processing in Joint Control with Hyundai Motor Company” for more information.

##### 4.3.5.2. Maps and Infotainment OTA Update

Maps and infotainment OTA Updates enable you to receive the latest maps and infotainment software updates for your vehicle.

For this function, the following categories of personal data are processed and sent to our Bluelink cloud environment: your Vehicle Identification Number (VIN), head unit manufacturer, head unit model, head unit firmware version, head unit system version, mobile network operator, vehicle model name, vehicle model year, vehicle region and your selected language. We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.3.6. **Notification Centre**

The Notification Centre allows us to send you important information about your vehicle. We will use this service only for important information. The information will appear as a pop-up in the infotainment system of your car. You can deactivate receipt of certain types of information in the settings or when you receive a pop-up.

For this function, the following categories of personal data are processed: read status; reading time.

We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.3.7. **Calendar**

The calendar allows you to synchronise your Google or Apple calendar on your smartphone with the integrated calendar function of the infotainment system of your vehicle in order to use it to set the navigation destination.

For this function, the following categories of personal data are processed and sent to our Bluelink cloud environment: email address, calendar ID, phone number, Google token/iCloud password and calendar entries (e.g. title of schedule, date/time, address, memo, attendance, etc.).

We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.3.8. **Like feature**

The like feature for USB and Bluetooth music and radio allows you to select and create a playlist with your favourite songs. You can like or unlike songs via the “thumbs-up” or “thumbs-down” button integrated in the music function of the infotainment system.

For this function, the following categories of personal data are processed: the source type (USB music, radio, Bluetooth music), the name of the song, artist and album, the like/unlike information, location information (GPS), ambient air temperature, vehicle speed, weather (based on your current location) and time information.

We process the personal data to perform our Services (Art. 6 (1) b) GDPR) and for the purpose of our legitimate interest in delivering our Services (Art. 6 (1) f) GDPR).

### 4.4. Provision of Bluelink Services – App

#### 4.4.1. **Remote Services**

Through the App we will provide you with the following remote Services. They will be activated as a presetting if not deactivated separately or entirely:

- a) Remote lock and unlock (you can lock and unlock the vehicle doors; *all Hyundai vehicles*)
- b) Remote charging (you can remotely activate the electric battery charging function; *all Hyundai EV and PHEV vehicles*)

- c) Scheduled charging (you can remotely set the electric battery charging schedule (*all Hyundai EV and PHEV vehicles*) including the target temperature; *all Hyundai EV vehicles*)
- d) Remote climate control (you can set the temperature and activate the air conditioning remotely; *all Hyundai EV vehicles*)
- e) Remotely open and close the charging door (you can open and close the charging door of your vehicle remotely; *only for some Hyundai EV vehicles; not for Hyundai PHEV vehicles*)
- f) Remote control of hazard lights / sidelights (you can turn off the lights remotely from the app when your vehicle is left with its hazard lights and/or sidelights on; *only for some Hyundai vehicles*)
- g) Find my car (you can localise the parking position of your Hyundai vehicle on the integrated map; *all Hyundai vehicles*)
- h) Send to car (you can search online for points of interest (POI) and address data in order to send search results from your smartphone application to the infotainment system of your car)
- i) My car POI (synchronises your stored POI between the infotainment system and your App; *all Hyundai vehicles*)
- j) Last mile navigation (sends the current location of your car and information about your destination (e.g. name, address, geolocation data) to your smartphone to guide you from your parking spot to your destination via Google Maps or augmented reality; *all Hyundai vehicles*)
- k) First mile navigation (sends the current location of your car to your smartphone to guide you from your location (e.g. name, address, geolocation data) to your car via Google Maps or augmented reality; *all Hyundai vehicles*)
- l) Valet parking mode (protects your private infotainment information by showing only the valet mode screen on your infotainment system unless you enter the password you have previously selected; sends information about the current status of valet parking mode (on/off), current vehicle location (GPS coordinates), the start/end date of valet mode, the run/mileage/engine time of valet mode, maximum vehicle speed, vehicle run distance and engine idle time to your smartphone; *all Hyundai vehicles*)
- m) Battery charging status (shows you the battery charging status of the electric motor; *all Hyundai EV and PHEV vehicles*)
- n) Push notifications for certain use cases (the application sends push notifications to your smartphone in certain cases, for example: your Hyundai vehicle is unlocked and the burglar alarm is activated in your Hyundai vehicle, the windows of your



vehicle are open, rear seat alert, engine idling alert, high-voltage battery discharge alarm, climate control status, charging status, software update status, valet parking mode activated/deactivated, etc.; *all Hyundai vehicles, the specification varies on the country or vehicle model*)

You can deactivate all remote Services separately.

In order to provide you with the remote Services once connected through the App, a connection is established between your vehicle and our Bluelink cloud environment which requires the processing of certain vehicle-related data including your vehicle SIM card's IP address, the Vehicle Identification Number (VIN) and further user-related data in the App (your device's IP address, PIN and other user account information such as your user name).

The provision of the remote Services requires the collection and processing of certain data relating to your vehicle including a password, your vehicle's Vehicle Identification Number (VIN) and geolocation data (e.g. GPS coordinates for "Find my Car"), the Integrated Circuit Card Identifier of your vehicle's SIM card (ICCID), address data and vehicle-related technical data (e.g. vehicle status information such as ignition on/off, vehicle speed, light status, lock status).

We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.4.2. **Vehicle status information via Bluelink**

Through the App, we will provide you with the following vehicle status information:

- a) Monthly vehicle report (provides you with information about the usage of your Hyundai car and diagnostics information covering the airbag, brakes, tyre pressure, etc. (see Section 4.3.3); *all Hyundai vehicles*)
- b) Status update (provides you with information about the vehicle status of your Hyundai car regarding the distance to empty, fuel level, engine on/off, door lock status, climate control status, tailgate open/closed, bonnet open/closed, windows open/closed, sunroof open/closed, tyre pressure status, lamp status (*all Hyundai vehicles*); high-voltage battery charging status, scheduled charging on/off, charging door open/closed, steering wheel heating status, defrost on/off, rear window heating on/off, side mirror heating (*all Hyundai EV and PHEV vehicles*); scheduled climate control on/off (*all Hyundai EV Vehicles*))
- c) My trips (provides you with information about the Hyundai vehicle usage per month/day, including driven time, mileage, average vehicle speed, maximum vehicle speed; *all Hyundai vehicles*)
- d) Energy consumption (provides you with information about your Hyundai vehicle's energy consumption per day and per month, including the total and average energy consumption, driving distance and recuperation; *all Hyundai EV vehicles*)

In order to provide you with the vehicle status information once connected through the App, a connection is established between your vehicle and our Bluelink cloud environment which requires the processing of certain vehicle-related data including your vehicle SIM card's IP address, the Vehicle Identification Number (VIN) and further user-related data in the App (your device's IP address, PIN and other user account information such as your user name).

The provision of the vehicle status information requires the collection and processing of certain data related to your vehicle (e.g. the driven time, mileage, average vehicle speed, maximum vehicle speed) and vehicle-related technical data (e.g. vehicle status data such as engine on/off, door lock status, etc., as listed above).

We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.4.3. **Car sharing**

You can share the remote Services with other users through the "*Request to Share Car*" function in the application.

When you do so, we process certain vehicle- and user account-related data such as your PIN, Vehicle Identification Number (VIN), your user name and the other user's phone number to initiate and process your sharing request. Share request information such as your name and PIN will be transmitted to and processed in the other user's App. The other user can use the App in the same way as you. He/she can also use the "*Find my Car*" function.

We process the personal data for sharing the remote Services for the purpose of performing our Services (Art. 6 (1) b) GDPR) and in connection with our legitimate interests in delivering our Services (Art. 6 (1) f) GDPR).

**Please note** that when you use this service, you will share all of your personal data, excluding your login details, that is stored in the App with the other users. You can deactivate this function at any time. Deactivation stops the sharing of data and we will delete all shared data on the other user's App.

#### 4.4.4. **Alert Services**

When activated in the App, alert services enable you to receive notifications relating to your chosen settings. We provide you with the following alert services through the App:

- a) Geofence alert (enables you to receive notifications in the App if your vehicle exits an allowed area or enters a restricted area. You can set the boundaries for allowed areas and restricted areas in the App)
- b) Speed alert (enables you to receive notifications in the App if your vehicle exceeds the speed limit you have preset in the App)
- c) Time fencing alert (enables you to receive notifications in the App if your vehicle is driven outside of the time windows you have preset in the App)
- d) Valet alert (enables you to receive notifications in the App if your vehicle travels beyond the selected distance limit, speed limit and idle time limit you have preset

in the App. The permitted travel distance is from the location where the alert was activated)

- e) Idle alert (enables you to receive notifications in the App if your vehicle is driven beyond the idle time limit you have preset in the App)

For this purpose, we collect and process the following categories of personal data:

Vehicle identification number (VIN), date and time stamp, GPS data, alert status information (e.g. activation status, alert status start and end time, run time, mileage time, engine idle time, maximum speed, run distance), vehicle indicators (e.g. location, speed, time, accuracy, direction), selected allowed areas, selected restricted areas, selected speed limit, selected time windows, selected distance limit and selected idle time limit. We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.4.5. **Other location-based services**

- a) View previous trips
- b) Send a destination to the car for a trip and add tourpoints to a planned trip
- c) Find your favourite and recent points of interest (POI)
- d) Share your POI

The provision of these remote Services requires the collection and processing of certain vehicle-related data such as the vehicle's geolocation data (GPS coordinates).

We process your personal data to provide you with these other location-based services, and thus for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.4.6. **Bluelink user profile**

The Bluelink user profile allows you to save various vehicle settings in our Bluelink cloud environment and apply them to different vehicles. If two or more drivers use the same vehicle but prefer different settings (e.g. for seat position, audio or map view, etc.), these individual settings can be stored in up to two user profiles plus one guest profile per vehicle.

For each user profile, the following categories of personal data are processed and sent to our Bluelink cloud environment: Vehicle Identification Number (VIN) of your vehicle and the target vehicle (if appropriate), driver number, account number, phone number, user picture, profile data as well as phone connection, Bluetooth settings, date/time settings, general settings, sound settings, display settings, voice recognition settings, radio settings, vehicle settings, navigation settings and points of interest (POI).

We process your personal data for the purpose of performing our Services (Art. 6 (1) b) GDPR).

#### 4.4.7. **Use of Touch ID and Face ID (iOS) or fingerprint and face recognition (Android)**

You can use certain functions of our App with Touch ID or Face ID (iOS) or fingerprint and face recognition (Android) instead of your PIN.

Your biometric data is only stored locally on your smartphone device; it is not transmitted to us and we cannot access this data. Only the information as to whether the verification of the biometric data was successful is transmitted to our App by a system function of your smartphone.

You can turn off the use of Touch ID or Face ID (iOS) or fingerprint and face recognition (Android) at any time in our App.

#### 4.4.8. **Firestore Crashlytics**

To improve the security and stability of our app and Services, we rely on the analysis of anonymised crash reports. For this purpose we use “Firestore Crashlytics”, a service of Google Ireland Ltd., Google Building Gordon House, Barrow Street, Dublin 4, Ireland.

In order to provide us with anonymised crash reports, Firestore Crashlytics collects the following information in the event of a crash or malfunction of our app and may transmit it to Google servers in the USA: state of the app at the time of the crash, installation UUID, crash traces, manufacturer and operating system of the mobile device and last log messages. The crash reports provided to us do not contain any personal data on the basis of which we could trace the identity of a user. Firestore Crashlytics retains collected information for 90 days.

We process your personal data for these purposes based on our legitimate interest to ensure and optimise the security and stability of our app and Services (Art. 6 (1) f) GDPR).

For more information about Firestore Crashlytics and how Google is processing your personal data, please refer to the following links:

<https://firebase.google.com/>  
<https://firebase.google.com/terms/crashlytics/>  
<https://firebase.google.com/support/privacy/>

#### 4.5. Product improvement and development

Hyundai collects and processes telematics data regarding the performance, usage, operation and condition of the vehicle from your vehicle and/or your App in order to improve and develop its products and transfers this data to Meridian Enterprises Ltd so that it can also process the data for these purposes.

The data used for these purposes is limited to technical data that does not allow the respective team members to identify any natural persons. The data used to improve and develop the powertrain, hybrid/EV vehicles and other car functions comprises ABS, the ABS status, steering wheel information, handbrake, traction control system, cluster information, seatbelt, acceleration, battery condition, door key lock, head lamp, indicator signal, light system, hands-free boot system, seat height, sunroof, wiper, navigation (on/off) and similar technical data and trouble codes as mentioned in Section 4.3.3.

The legal basis for the processing of your data for these purposes is the legitimate interest of Hyundai in improving the Services and developing new products and services (Art. 6 (1) f) GDPR; e.g. to identify technical malfunctions, analyse the performance of the vehicles or provide enhanced products or customer services).

In addition, your personal data as described above may be anonymised in order to perform our own analytics for improving and developing the products.

5. **What applies to data of other data subjects and to the sale and transfer of the vehicle to third parties?**

When lending the car to another person or in cases where the data of other data subjects (such as another driver) might be collected when using the Services, you have to ensure that the data subjects are properly informed on the data processing as described herein.

When selling or permanently transferring the vehicle to a third party, please ensure that none of your personal data can be accessed through the infotainment system (e.g. by erasing trip data or destinations in the settings).

You can disconnect the vehicle from a Bluelink App (whether this is your own or another person's App) by deactivating Hyundai Bluelink in the infotainment system. By deactivating Hyundai Bluelink in the infotainment system, your driving data will no longer be visible in the application and your vehicle will be disconnected from the application. If you do not disconnect the vehicle, the data might still be accessible through the App. Your account data in the application will not be deleted until you delete your account.

6. **With whom is my data shared?**

Due to their role as joint controllers when offering the Services, Meridian Enterprises Ltd and Hyundai will receive your personal data. Any access to your personal data at Hyundai and the Distributor 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:

- Hyundai - Hyundai receives your personal data in its role as technical and operational provider of the Services and will transmit certain data to CTC Automotive Ltd as described above (e.g. for product development purposes).
- Other private third parties - We transmit your personal data to certain private entities that help us offer the Services. For instance, we rely on telecommunication services from telecommunication providers.
- 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.

- The data processor for Bluelink is Hyundai Autoever Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany.
- For Hyundai Live and the remote Service “Find my Car”, the data processor is: Hyundai Autoever Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany (e.g. for hosting and support or operating relevant applications).
- For voice recognition, the data processors are: Cerence B.V. Netherlands, Olympia 2 D, 1213 NT Hilversum, Netherlands; Hyundai Autoever Europe, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany (e.g. for support and operating relevant applications).
- The data processors for call centre services are affiliates of Hyundai, which are all located in the EU/EEA.
- These data processors may also use sub-processors for the provision of the corresponding services.
- Governmental authorities, courts, external advisors and similar third parties that are public bodies as required or permitted by applicable law.

## 7. **Is my data transferred abroad?**

Some of the 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. Cerence’s 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 3.2 above).

## 8. **How long will my data be stored?**

- 8.1. Your personal data is stored by Hyundai and/or our service providers solely to the extent that is 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. Under no circumstances will your personal data be stored after the termination of your account. 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 retention of up to 10 years).

8.2. There are specific storage periods for the following items:

- Voice recognition: voice samples and GPS coordinates (see Section 4.3.2 above) are stored for up to 90 days.
- Hyundai Live: geolocation data (GPS coordinates) and service ID (see Section 4.3.1 above) are stored up to 93 days.
- My trips: the information about your vehicle usage provided in “My trips” is available for up to 90 days.

8.3. **Deactivation of Services:** You can turn certain Services on/off separately in the App’s menu under “Service list”.

8.4. **Termination of account:** If you choose to terminate your account (e.g. by setting the respective preference in the car’s infotainment system or in the App’s menu under “My Account”), all personal data related to your account will be deleted, unless retention periods apply (see Section 8.1 above).

## 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.

The Distributor shall be the contact point for any request by data subjects concerning the processing of personal data in connection with this Privacy Notice and its appendix. However, you shall remain entitled to exercise your rights under the GDPR and national data protection laws with respect to and against each controller.

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 to 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**: 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.
- 9.7. **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 our Services will be limited for you.

11. **Can I deactivate online mode (offline mode; modem off)?**

You may choose to deactivate online mode by setting the respective preference. If online mode is turned off (offline mode), all Bluelink functions are disabled and no personal data, in particular no geolocation data (GPS coordinates), is collected for Bluelink and an offline mode icon is displayed at the top of the infotainment system screen in the vehicle.

12. **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. We will publish the changes on our websites and/or in your car’s infotainment system and in the App.

**Appendix: Data processing in joint control with Hyundai Motor Company**

The purpose of this Appendix is to inform you about the collection and processing of your personal data in connection with the provision of individual Services for which we may act as joint controller with affiliated companies.

Insofar as no specific information is provided via this Appendix, the general information and regulations from the Privacy Notice shall also apply to this Appendix.



## **Who is responsible for processing my data?**

We, the Distributor and Hyundai, will act as joint controller with the Hyundai Motor Company with its registered office at 12, Heolleung-ro, Seocho-gu, Seoul, Republic of Korea for the following purposes:

- To ensure appropriate cyber security standards of our vehicles and products
- To provide you with over-the-air software updates for the vehicle system

### **Cyber security**

Once you activate the Services we will manage and monitor appropriate cyber security standards of our vehicles and products. Hyundai and the Distributor are responsible as set out in Section 2 of the Privacy Notice and will collect and transmit your data to Hyundai Motor Company. Hyundai Motor Company will monitor the appropriate cyber security standards of our vehicles and products on an operational and technical level and use your personal data for the purposes as described below.

### **Vehicle system OTA Updates**

Once you activate the Services we provide you with the option to receive wireless (“over-the-air”) software updates (“OTA Updates”) for the vehicle system. Hyundai and the Distributor are responsible as set out in Section 2 of the Privacy Notice and will collect your data and transmit it to Hyundai Motor Company. Hyundai Motor Company will process your personal data as described in Section 4.3.5.2. and for the purpose of making vehicle system OTA Updates more efficient and convenient. In this regard, Hyundai Motor Company will steer the deployment and monitoring of the vehicle system OTA Updates on a global level to ensure that software updates meet technical requirements and standards, in particular with regard to cyber security and system stability.

Hyundai and the Distributor enter into an agreement with Hyundai Motor Company governing the processing of personal data. Upon request, the Distributor will provide information on the essence of such an agreement to you, insofar as this is provided for under local law.

## **How can I contact the controller and the data protection officer?**

If you have any questions about or in connection with this Appendix or the exercising of any of your rights, you may contact the Distributor or Hyundai via the contact details as listed in Section 3 of the Privacy Notice.

Alternatively, you may also assert your rights as a data subject vis-à-vis Hyundai Motor Company. In this case, please contact Hyundai as a representative of Hyundai Motor Company in accordance with Art. 27 GDPR as follows:

Email: [dataprotection@hyundai-europe.com](mailto:dataprotection@hyundai-europe.com)

Postal address: Hyundai Motor Europe GmbH

Data Protection Representative of Hyundai Motor Company

Kaiserleipromenade 5

63067 Offenbach

Germany

## **What categories of personal data are processed, for what purposes and on what legal basis?**

### **Cyber security**

Depending on the technical equipment of your vehicle, we collect and process security event-related data of your vehicle to ensure appropriate cyber security standards of our vehicles and products.

For this function, the following categories of personal data are processed: the Vehicle Identification Number (VIN) and security event-related data (such as the timestamp of the generated security event and information from and about the component / control unit that captured and detected a security event).

The data will be collected and stored in your vehicle. If an abnormal signal is detected, the data will be sent to our systems for further analysis. There is no continuous transfer of such data out of the vehicle.

Once data has been transmitted to our systems, we process and analyse the data for the purpose of preventing cyber security threats and vulnerabilities, responding to and eliminating detected threats and vulnerabilities from potential cyber security attacks, as well as ensuring appropriate security of our vehicles and products.

Insofar as such processing is not necessary for compliance with our legal obligations in the area of cyber security (Art. 6 (1) c) GDPR), the legal basis for the processing of your data for these purposes is the legitimate interest of Hyundai in monitoring our vehicles in order to ensure and improve the security of our products (Art. 6 (1) f) GDPR).

### **Vehicle system OTA Updates**

In addition to Section 4.3.5.2. of the Privacy Notice we may transmit the same categories of personal data to Hyundai Motor Company, which will process your personal data for the same purposes as well as for the purpose to ensure an efficient and convenient performance of vehicle system OTA updates and to steer the deployment and monitoring of the vehicle system OTA updates on a global level. Within this scope we will process your personal data to comply with legal obligations (Art. 6 (1) c) GDPR (e.g. in the area of product safety requirements)) as well as for performing our Services (Art. 6 (1) b) GDPR, and based on our legitimate interest to effectively steer our OTA update processes on a global level (Art. 6 (1) f) GDPR.

### **With whom is my data shared?**

Any access to your personal data 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 the controllers 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.
- The data processor for Bluelink is Hyundai AutoEver Europe GmbH, Kaiserleistraße 8A, 63067 Offenbach am Main, Germany.
- The data processor for providing technical support and maintenance of IT systems with regard to ensuring appropriate cyber security standards is Hyundai AutoEver Corp., 417 Yeongdong-daero Gangnam-gu Seoul, 06182 Republic of Korea.

### **Is my data transferred abroad?**

Hyundai Motor Company is located and has relevant operations outside of your country and the EU/EEA, in the Republic of Korea. With regard to the processing of your data as described in this Appendix, your data will be transferred to the Republic of Korea. The Republic of Korea has data protection laws that provide an equal level of protection to the laws in your jurisdiction and has an adequacy decision by the European Commission.

### **How long will my data be stored?**

In addition to Section 8 of the Privacy Notice, there are specific storage periods:

- Your vehicle will periodically store the last 100 generated security events. In case of a new security event, the oldest security event and related data will be deleted.