

## **Hyundai Connected Mobility GmbH**

### **HYUNDAI PAY - PRIVACY NOTICE**

Valid from February 2025.

Other language versions of this Privacy Notice can be accessed and downloaded at:

<https://www.hyundai.com/eu/hyundai-pay-privacy-notice.html>

#### **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 the Hyundai Pay service ("Hyundai Pay") and is addressed to our customers using Hyundai Pay in the Hyundai Store and for In-Car Payment services. 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 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?**

Hyundai Connected Mobility GmbH with its registered office at 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 as 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 at the phone number +49 69271472377.

You may also contact Hyundai by sending an email to [bluelink@hyundai-europe.com](mailto:bluelink@hyundai-europe.com).

Alternatively, you may also contact our data protection officer at the email address [HCM.dataprotection@hyundai-europe.com](mailto:HCM.dataprotection@hyundai-europe.com), or by writing to: c/o Data Protection Officer  
Hyundai Connected Mobility GmbH

Kaiserleipromenade 5

63067 Offenbach, Germany

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

##### **4.1. Provision of Hyundai Pay**

Hyundai Pay is Digital Wallet service offered by Hyundai Connected Mobility.

The main purpose of the service is to allow you to store your payment card data and the associated billing information, and to use the payment cards that you have stored in Hyundai Pay.

Further information about Hyundai Pay can be found in the Hyundai Pay Terms of Use.

##### **4.1.1. Registering a payment card in Hyundai Pay**

When you add a payment card to Hyundai Pay, we only store encrypted information about your payment card in the form of a token.

To create the token, the details of your card are collected and processed by a tokenisation service provider, which is Bell Identification B.V. (VISA Token ID) (see also Section 5 on data recipients below).

We collect further information from you to: (i) make your payment card identifiable by displaying your name and the last four digits of the card in Hyundai Pay; and (ii) be able to create a legally valid invoice containing the information provided by you for this purpose, including your billing address.

For this purpose, the following categories of personal data are processed: payment card number, type of card, card holder name, expiry date, security code, any other information required by the issuing bank or the payment network to verify your identity and your permission to use the card, the token provided by the tokenisation service provider, the last four digits of the payment card number, the card holder name, the type of card, the billing address, any further information to be included on the invoice (if relevant and provided by you).

The processing of your data during registration of your payment card is necessary for the performance of the contract that you have entered into with us (Art. 6 (1) b) GDPR) for the provision of Hyundai Pay.

In relation to the tokenisation process, the processing of your personal data is necessary for the purpose of the legitimate interests pursued by us (Art. 6 (1) f) GDPR).

Our legitimate interests are: providing a secure payment process that minimises the risk of data losses by using tokenised payment card information.

#### **4.1.2. Management of information in Hyundai Pay**

When you view the payment information stored in the Hyundai Pay service, the underlying information is displayed.

This includes the type of card, the card nickname (if added by you), the last four digits of the card number, the billing address, any further information to be included on the invoice (if relevant and provided by you). If you remove a payment card from Hyundai Pay, the related personal data is removed from our systems, and the respective payment card can no longer be used for payments within the Hyundai Store.

If you withdraw your Hyundai Pay account, all personal data is removed from our system.

For this purpose, the following categories of personal data are processed: the token of the respective payment card, the last four digits of the payment card number, the card holder name, the card nickname (if added by you), the type of card, the billing address, any further information to be included on the invoice (if relevant and provided by you).

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

#### **4.1.3. Making a payment**

When you make a payment in the Hyundai Store using a payment card stored in Hyundai Pay, we send the token of the payment card together with all other information required to carry out the payment to our payment service provider, Stripe Payment Europe Ltd., One Building, 1 Grand Canal Street Lower, Dublin 2, Ireland (see also Section 5 on data recipients below).

Stripe acts as an independent controller and processes the data for its own purposes regarding payment processing.

Please see Stripe's own data protection information for further details. You can access this information here: <https://stripe.com/legal/privacy-center>.

For this purpose, the following categories of personal data are processed: payment card token, payment amount, applicable currency, booking text to be included on the payment card statement, information on whether the payment was carried out successfully.

Payments for In-Car Payment services are covered separately in the Terms of Use of the In-Car Payment service.

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

#### **4.1.4. Invoice preparation**

When you make a payment in the Hyundai Store, you will be provided the invoice as a PDF document that contains the relevant information about your purchase.

For this purpose, we use the invoice service provided by our payment service provider, Stripe Payment Europe Ltd., One Building, 1 Grand Canal Street Lower, Dublin 2, Ireland (see also Section 5 on data recipients below).

In the context of invoice preparation, Stripe acts as a processor for us.

For this purpose, the following categories of personal data are processed: your name and billing address, any further information to be included on the invoice (if relevant and provided by you), number and type of the items purchased (including the name of the upgrade and the usage period for which it was purchased), the price of the items purchased, applicable currency, applicable VAT rate.

The processing is necessary for the performance of the purchase contract (Art. 6 (1) b) GDPR) for the purchased items.

Purchases made for In-Car Payment services are subject to the Terms of Use of In-Car Payment. The invoice will be provided by the merchant of record via email.

#### **4.2. Communication and marketing**

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

##### **4.2.1. Communication:**

We may process your personal data to communicate with you about Hyundai Pay or the contract that you have entered into with us (e.g. to provide customer support, to inform you about technical issues with Hyundai Pay, to perform our contractual obligations or to inform you about changes to the Hyundai Pay Terms of Use or this Privacy Notice) via several communication channels.

When you contact us via one of the communication channels provided, we may process your personal data to handle your request and to communicate with you accordingly as regards your request.

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 Bluelink Store and/or In-car Payment, 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 3rd 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 obtained directly from you and your registration 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 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 the purposes of 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. 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:
- BlueWalnut Co. Ltd, who provides the overall IT infrastructure and services enabling Hyundai Pay operations, in its capacity as data processor;
- Hyundai Motor Company, who supports the processing in relation to service maintenance and critical technical issues, in its capacity as data processor;
- Stripe Payment Europe Ltd (“Stripe”), who provides services related to invoicing and intermediating in the payment process; Bell Identification B.V., who provides services in relation to the tokenisation of your payment card data;
- Partners providing customer data management platforms and connected car data management platforms;
- Third parties that manage the contact centre and chat services;
- Third parties such as market research companies, marketing agencies and lead generation companies, as well as other third parties who provide us with personal data.
- **Government authorities, courts and similar third parties that are public bodies** as appropriate, based on compliance with legal obligations related to civil, penal, tax, or administrative 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 i.e. tax consultants, auditors, accountants, legal advisors, telecommunications providers, etc. Such recipients will usually process the relevant personal data as independent controllers.

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

In principle, your data related to Hyundai Pay 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 5.

The European Commission has determined that Korea and 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. BlueWalnut’s sub-processors, Stripe affiliates), 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).

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

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 requires your personal data for such purposes, we will erase it from our systems and/or records, and/or take steps to properly anonymise it so that you can no longer be identified from the data (unless we 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 maybe subject to statutory retention requirements, which may require retention of up to 10 years).

If you choose to terminate your Hyundai Pay account all your personal data related to Hyundai Pay will be deleted, unless retention periods apply (see Section 4.1.2 above)

## 6. **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.

The withdrawal of your consent will not affect the lawfulness of processing based on such consent before its withdrawal.

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 could be subject to certain limitations under applicable local data protection laws.

**6.1. 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 personal data concerned, and the recipients or categories of recipients to whom the 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.

**6.2. 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.

**6.3. Right to erasure (“right to be forgotten”)**

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

**6.4. 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 flagged accordingly and may only be processed by us for certain purposes.

**6.5. 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 controller.

**6.6. 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.

**6.7. Right to make a complaint**

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

**7. 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 Hyundai Pay will be limited for you.

**8. HOW CAN THIS PRIVACY NOTICE BE CHANGED?**

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

Such changes and/or additions 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.